

To: Bremberg, Andrew P. EOP
From: Schnare, David
Sent: Fri 2/10/2017 6:22:45 PM
Subject: War on Coal EO
[Final - Climate Change.docx](#)

Ex. 6 - Personal Privacy

After our discussion I'm not sure I still needed to send this to you, but to ensure we don't miss any opportunities, attached is the War on Coal Executive Order you had approved back when we were working transition.

dschnare

To: Dunham, Sarah[Dunham.Sarah@epa.gov]
From: Page, Steve
Sent: Wed 5/31/2017 10:03:57 PM
Subject: Fwd: Draft RIA, 5/31/17 version
[proposed rescission draft RIA 053117.docx](#)
[ATT00001.htm](#)

Sent from my iPhone

Begin forwarded message:

From: "Sasser, Erika" <Sasser.Erika@epa.gov>
To: "Page, Steve" <Page.Steve@epa.gov>, "Koerber, Mike" <Koerber.Mike@epa.gov>
Cc: "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>, "Weatherhead, Darryl" <Weatherhead.Darryl@epa.gov>, "Macpherson, Alex" <Macpherson.Alex@epa.gov>, "McGartland, Al" <McGartland.Al@epa.gov>, "Harvey, Reid" <Harvey.Reid@epa.gov>
Subject: FW: Draft RIA, 5/31/17 version

Steve—

Attached is the revised RIA for proposed CPP rescission. The document now contains all the parts, but there are still some rough spots. We plan to proofread and make minor clarifying edits tomorrow. It should be fine for Sarah, Mandy and OP to review at the same time.

Thanks,

Erika

To: Gunasekara, Mandy[Gunasekara.Mandy@epa.gov]; Dravis, Samantha[dravis.samantha@epa.gov]; Schwab, Justin[schwab.justin@epa.gov]; Bolen, Brittany[bolen.brittany@epa.gov]; Schmidt, Lorie[Schmidt.Lorie@epa.gov]; Zenick, Elliott[Zenick.Elliott@epa.gov]; McGartland, Al[McGartland.Al@epa.gov]; Rees, Sarah[rees.sarah@epa.gov]
Cc: Page, Steve[Page.Steve@epa.gov]; Koerber, Mike[Koerber.Mike@epa.gov]; Tsirigotis, Peter[Tsirigotis.Peter@epa.gov]; Sasser, Erika[Sasser.Erika@epa.gov]; Harvey, Reid[Harvey.Reid@epa.gov]; Dunham, Sarah[Dunham.Sarah@epa.gov]
From: Lewis, Josh
Sent: Fri 5/26/2017 6:59:32 PM
Subject: For review: latest drafts of the CPP documents
[CPP Proposed rescission draft RIA 052617.docx](#)
[EO12866 CPP Rescission 2060-AT55 Proposal 5-26.jl.docx](#)

Attached are the latest drafts of the CPP Rescission Notice Preamble and the RIA. Sarah and others in OAR are still reviewing one/both of these, but we wanted you to have the latest drafts before the long weekend.

A few notes on the preamble:

Ex. 5 - Deliberative Process

A few important notes on the RIA:

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

We anticipate having the next draft of the RIA ready by COB Wednesday, pending comments received from this review.

Josh

To: Snowden, Gregory A[Gregory.Snowden@opm.gov]; Mahoney, Michael J[Mike.Mahoney@opm.gov]; Coleman, Darrell E[Darrell.Coleman@opm.gov]; Thornton, Cathryn[Cathryn.Thornton@opm.gov]; Butler, Monica[Monica.Butler@opm.gov]; Mulligan, James S. EOP/OMB Ex. 6 - Personal Privacy

Cc: Vizian, Donna[Vizian.Donna@epa.gov]; Showman, John[Showman.John@epa.gov]; Gray, Linda[gray.linda@epa.gov]; Carpenter, Wesley[Carpenter.Wesley@epa.gov]; Hart, Debbi[Hart.Debbi@epa.gov]; Parker, Gary[parker.gary@epa.gov]

From: Hunt, Loretta

Sent: Fri 6/16/2017 10:55:52 PM

Subject: EPA Draft VERA/VSIP Request Email 1 of 3
[EPA VERA Request.pdf](#)
[EPA VSIP Request.pdf](#)
[EPA Prog and Reg Business Cases 6-16-17 ver 3.docx](#)

The U.S. Environmental Protection Agency is submitting a draft VERA/VSIP request to OPM and OMB for review and comment. The agency is submitting one overall request but specific details are included for each program and regional office since the needs of each organization varies. The agency is submitting the following documentation:

1. EPA's VSIP Request (.pdf)
2. EPA's VERA Request (.pdf)
3. Business cases (all contained in one Word file; the Table of Contents provides direct links to each of our 22 business cases)
4. Targeted positions spreadsheets for each office (Excel file)
5. Organization charts (one .pdf file)
6. Agency level analysis/summary slides (PowerPoint)

We will send three emails containing the agency's draft request and supporting documentation.

Should you have any questions or concerns about EPA's request, you may contact me at hunt.loretta@epa.gov; (202)564-6963 or Debbi Hart at hart.debbi@epa.gov; (202) 564-2011.

Thank you in advance for your assistance with EPA's workforce reshaping efforts.

To: Gray, Linda[gray.linda@epa.gov]
From: Burbach, Joseph
Sent: Fri 5/5/2017 3:56:44 PM
Subject: RE: working group members
[OMB memo 04-17-22.pdf](#)
[Appendix 1 - Timeline and Deliverables.pdf](#)
[Actions.pdf](#)
[PARS Order NBU Remove EE and MS 5-1-17.docx](#)
[PARS non-barg 5-1-17.docx](#)
[OMB April 12 Memo Highlights.docx](#)

These are the documents that I have including what you emailed from Loretta:

OMB memo

OMB memo attachment (appendix 1)

Loretta's Documents (Actions and PARS info)

OMB Memo highlights

The other document that I prepared was an OHR specific reshaping considerations so probably not for this group which I think is focused on the performance component.

Joseph Burbach

Senior Advisor

Office of Human Resources

U.S. Environmental Protection Agency

(202) 564-7783

From: Gray, Linda
Sent: Friday, May 05, 2017 11:32 AM
To: Burbach, Joseph <burbach.joseph@epa.gov>
Subject: FW: working group members

These are the team members. I want to send them the four documents

Linda R. Gray

Director, Office of Human Resources

Office of Administration and Resources Management

Environmental Protection Agency

(202) 564-4606 phone

(202) 564-4613 fax

From: Corbett, Krysti

Sent: Thursday, May 04, 2017 11:26 AM

To: Gray, Linda <gray.linda@epa.gov>

Cc: Patterson, Nicole <Patterson.Nicole@epa.gov>

Subject: RE: working group members

Here you go:

OGC: Rebecca Wulffen

OHR: Joe Burbach

LERD: Nicole Patterson

PPTD: Detha McNeal

FLAG: Carmen Maso

ORD: Pat Vaughn

R9: Nancy Lindsay emailed – I think you were going to respond regarding whether we wanted an R1 or R9 person (R1 is fine). I haven't seen another email on this.

Krysti Corbett

Director

Labor and Employee Relations Division

Desk Phone: (202) 564-6295

Mobile: (202) 579-1681

corbett.krysti@epa.gov

From: Gray, Linda

Sent: Thursday, May 04, 2017 10:00 AM

To: Corbett, Krysti <Corbett.Krysti@epa.gov>

Subject: working group members

Krysti,

Can you send me the list of the working group members for the performance management team?
I have multiple emails and some names may have gotten away from me.

Linda R. Gray

Director, Office of Human Resources

Office of Administration and Resources Management

Environmental Protection Agency

(202) 564-4606 phone

(202) 564-4613 fax

To: Hart, Debbi[Hart.Debbi@epa.gov]; Gray, Linda[gray.linda@epa.gov]; Cunningham, Bisa[cunningham.bisa@epa.gov]; Hembrey, Cheri[Hembrey.Cheri@epa.gov]; Moore, Bobby[Moore.Bobby@epa.gov]; Peabody, Hitch[Peabody.Hitch@epa.gov]; Corbett, Krysti[Corbett.Krysti@epa.gov]
Cc: Hunt, Loretta[Hunt.Loretta@epa.gov]; Parker, Gary[parker.gary@epa.gov]; Dean, StevenB[Dean.StevenB@epa.gov]; Brown, Rohn[brown.rohn@epa.gov]; Terrell, Piyachat[Terrell.Piyachat@epa.gov]; Carpenter, Wesley[Carpenter.Wesley@epa.gov]
From: Burbach, Joseph
Sent: Fri 6/9/2017 2:22:03 PM
Subject: RE: Executive Memo
[m-17-22.pdf](#)
[Appendix 8.pdf](#)

For reference/background, please find attached the OMB memo that discusses agency responsibilities and deliverables that include developing an agency reform plan. Page 6 begins information concerning components for the reform plan and includes a table of factors and options for agencies to consider (these reference efforts to restructure, merge and eliminate, etc).

Also attached is Appendix 8 to the memo that provides some examples of agency workforce restructuring/reshaping efforts.

Joseph Burbach

Senior Advisor

Office of Human Resources

U.S. Environmental Protection Agency

(202) 564-7783

From: Hart, Debbi
Sent: Friday, June 09, 2017 9:58 AM
To: Burbach, Joseph <burbach.joseph@epa.gov>; Gray, Linda <gray.linda@epa.gov>; Cunningham, Bisa <cunningham.bisa@epa.gov>; Hembrey, Cheri <Hembrey.Cheri@epa.gov>; Moore, Bobby <Moore.Bobby@epa.gov>; Peabody, Hitch <Peabody.Hitch@epa.gov>; Corbett, Krysti <Corbett.Krysti@epa.gov>
Cc: Hunt, Loretta <Hunt.Loretta@epa.gov>; Parker, Gary <parker.gary@epa.gov>; Dean, StevenB <Dean.StevenB@epa.gov>; Brown, Rohn <brown.rohn@epa.gov>; Terrell, Piyachat <Terrell.Piyachat@epa.gov>; Carpenter, Wesley <Carpenter.Wesley@epa.gov>
Subject: RE: Executive Memo

Hey Joe-

Any chance you could resend the memo? Thanks in advance. Debbi

Debbi Hart
Director

Policy, Planning & Training Division
OHR, OARM
USEPA
202.564.2011
hart.debbi@epa.gov

From: Burbach, Joseph
Sent: Friday, June 09, 2017 9:52 AM
To: Gray, Linda <gray.linda@epa.gov>; Hart, Debbi <Hart.Debbi@epa.gov>; Cunningham, Bisa <cunningham.bisa@epa.gov>; Hembrey, Cheri <Hembrey.Cheri@epa.gov>; Moore, Bobby <Moore.Bobby@epa.gov>; Peabody, Hitch <Peabody.Hitch@epa.gov>; Corbett, Krysti <Corbett.Krysti@epa.gov>
Cc: Hunt, Loretta <Hunt.Loretta@epa.gov>; Parker, Gary <parker.gary@epa.gov>; Dean, StevenB <Dean.StevenB@epa.gov>; Brown, Rohn <brown.rohn@epa.gov>; Terrell, Piyachat <Terrell.Piyachat@epa.gov>; Carpenter, Wesley <Carpenter.Wesley@epa.gov>
Subject: RE: Executive Memo

Please include a few thoughts as to what issues would be addressed and/or what would be gained from the proposed restructuring. We should provide an appropriate basis for the change.

Thanks

Joseph Burbach

Senior Advisor

Office of Human Resources

U.S. Environmental Protection Agency

(202) 564-7783

From: Gray, Linda

Sent: Thursday, June 08, 2017 6:46 PM

To: Hart, Debbi <Hart.Debbi@epa.gov>; Cunningham, Bisa <cunningham.bisa@epa.gov>; Hembrey, Cheri <Hembrey.Cheri@epa.gov>; Moore, Bobby <Moore.Bobby@epa.gov>; Peabody, Hitch <Peabody.Hitch@epa.gov>; Corbett, Krysti <Corbett.Krysti@epa.gov>

Cc: Hunt, Loretta <Hunt.Loretta@epa.gov>; Parker, Gary <parker.gary@epa.gov>; Dean, StevenB <Dean.StevenB@epa.gov>; Brown, Rohn <brown.rohn@epa.gov>; Terrell, Piyachat <Terrell.Piyachat@epa.gov>; Burbach, Joseph <burbach.joseph@epa.gov>; Carpenter, Wesley <Carpenter.Wesley@epa.gov>

Subject: Executive Memo

Good evening,

A couple of weeks ago I asked you to take a look at the executive memo from the President and identify areas where we can recommend restructuring for the EPA. Please provide any feedback to Joe by COB Monday, June 12th.

Linda R. Gray

Director, Office of Human Resources

Office of Administration and Resources Management

Environmental Protection Agency

(202) 564-4606 phone

(202) 564-4613 fax

Last updated: April 12, 2017

Appendix 1: Timeline and Deliverables

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies. In summary, agencies should develop:

Product	Timeline	Scope	Reorg EO		Hiring Freeze PM	
			Agency Reform Plan	Plan to Maximize Employee Performance	Workforce Reduction Plan (part of Agency Reform Plan)	Plan (part of Agency Reform Plan)
			<ul style="list-style-type: none">Initial reform areas due June 2017 to OMBPossible near-term/immediate actionsFull plan due September 2017 to OMB concurrent with FY 2019 Budget submission to OMB	<ul style="list-style-type: none">Due June 2017 to OMB	<ul style="list-style-type: none">Initial areas due June 2017 to OMBProgress on near-term actions to reduce size of the workforceFull plan due September 2017 to OMB concurrent with FY 2019 Budget submission to OMB	<ul style="list-style-type: none">Actions to reduce the size and cost of the agency's workforce for FY2019-2022
			<ul style="list-style-type: none">Proposals to make the agency leaner, more accountable, and more efficientIncludes both legislative and administrative actions	<ul style="list-style-type: none">Timeline and implementation actions to maximize employee performance	<ul style="list-style-type: none">Actions to reduce the size and cost of the agency's workforce for FY2019-2022	

OMB will provide future guidance on cross-cutting areas. A detailed timeline is as follows¹:

Spring 2017:

- Agencies develop Agency Reform Plans and workforce reduction plans. Agencies should consult with key stakeholders, including their workforce, customers and partners in delivering on agency missions, such as state, local, and tribal governments. Agencies should engage with their OMB counterparts as well. Agencies are encouraged to look for opportunities to conduct consultations collaboratively with other agencies where they have complementary missions affecting the same stakeholders.

¹ This timeline is not comprehensive of all existing regular processes, such as the annual Budget process and performance timelines in OMB Circular A-11

- Reporting Burden Reduction. As agencies develop their Agency Reform Plan, OMB will also look for opportunities to eliminate or streamline agency reporting burden. Specifically:
 - Each government-wide management council (CXO) Council will identify additional policy and regulatory reporting requirements that are low-value, duplicative or no longer necessary for their management function for submission to OMB.²
 - Within 60 days of this memorandum, OMB – in coordination with agencies that place reporting and compliance requirements on other agencies – will identify initial reporting activities that can be immediately stopped or modified to reduce reporting and compliance burden.
 - In accordance with the GPRA Modernization Act of 2010³, agencies should also include with their FY 2019 Budget submission a list of statutorily required reports they believe should be eliminated or modified by Congress.

June 30, 2017: Agencies submit to OMB RMO and OMB Office of Performance and Personnel Management (PPM):

- Preliminary areas for Agency Reform Plan
- Progress on near-term actions to reduce the size of the civilian Federal workforce
- Plan for maximizing employee performance
- High-level draft strategic plan (draft strategic goals and objective areas)
- Potential near-term/immediate actions

Note: Draft Agency Priority Goal areas are no longer due in June 2017 or September 2017. See Appendix 3 for more detail.

July 2017: Agencies and OMB meet to discuss the June submissions with a focus on the Agency Reform Plan. These discussions will identify feedback to incorporate into agencies' final plans and the FY 2019 Budget submission to OMB. OMB and agencies will also identify additional actions the agency can take immediately.

September 2017. FY 2019 Budget submission to OMB. Agencies must include:

- Agency Reform Plan
- Agency draft FY2018-2022 Strategic Plan
- Workforce Reduction Plan, incorporated into the agency's budget submission and the Agency's draft Strategic Plan

² The CXO councils include the President's Management Council (PMC), Chief Acquisition Officers (CAO) Council, Chief Financial Officers (CFO) Council, Chief Information Officers (CIO) Council, Chief Human Capital Officers (CHCO) Council, and the Performance Improvement Officers (PIO) Council. For more information on these councils, please see: <https://www.gsa.gov/portal/category/101095>.

³ The Government Performance and Results Act (GPRA) Modernization Act of 2010 requires Federal agencies to identify for elimination or modification plans and reports that are outdated or duplicative (see OMB Circular A-11, Part 6, Section 290). Congressionally-required plans or reports identified as duplicative, outdated or unnecessary as part of the GPRA Modernization Act requirement should be included as part of Agency Reform Plan submissions to OMB in September.

Last updated: April 12, 2017

The CXO Councils will also provide OMB suggestions for policy, regulatory or other changes to eliminate low-value, duplicative or outdated activities.

February 2018. Concurrent with the FY 2019 President's Budget, publish:

- a. Government-wide Reform Plan, which will include both agency and crosscutting reforms. The final plan will include both legislative actions for Congressional consideration and administrative actions that agencies can begin immediately.
- b. Final Agency Strategic Plan and final Long-Term Workforce Reduction Plan. Workforce reduction planning must be reflected in the Agency's Human Capital Operating Plan, in accordance with 5 CFR 250. Forthcoming guidance will be provided to agencies for implementing the requirements of 5 CFR 250.

June 2018 (tentative). Agencies will provide OMB and OPM the first progress update on the objectives included in the Government-wide Reform Plan, including efforts to achieve savings and workforce targets.

Appendix 2: Applicable Agencies & Additional Detail on Reform Plan Meetings

Last updated: April 12, 2017

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies.

Applicable Agencies: All agencies, boards, and commissions must submit Agency Reform Plans in September 2017, unless an exception has been granted by OMB. Limited exceptions will be granted on a case-by-case basis. OMB will meet in July only with CFO Act agencies and a limited number of other agencies.

CFO Act Agencies: The Chief Financial Officers Act of 1990 (Public Law 101-576) required CFOs at 24 large agencies. As of the issuance of this memorandum, the CFO Act agencies are:

1. Department of Agriculture
2. Department of Commerce
3. Department of Defense
4. Department of Education
5. Department of Energy
6. Department of Health and Human Services
7. Department of Homeland Security
8. Department of Housing and Urban Development
9. Department of Justice
10. Department of Labor
11. Department of State
12. Department of the Interior
13. Department of the Treasury
14. Department of Transportation
15. Department of Veterans Affairs
16. Environmental Protection Agency
17. General Services Administration
18. National Aeronautics and Space Administration
19. Nuclear Regulatory Commission
20. National Science Foundation
21. Office of Personnel Management
22. Small Business Administration
23. Social Security Administration
24. U.S. Agency for International Development (USAID)

Last updated: April 12, 2017

Appendix 3: Performance Management

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies. This Appendix includes guidance to agencies on the Federal performance management framework for planning and reporting in 2017. OMB intends to update guidance in OMB Circular A-11 during the next cycle (anticipated Summer 2017) where applicable.

FY 2018 Budget Performance Planning and Reporting:

What is the timeline for submitting and publishing agency FY 2018 APP and FY 2016 APPs to OMB for review and clearance?

- 4/25: For OMB review and clearance, agency submits final draft FY 2018 APP / FY 2016 APP
- 5/9: OMB feedback to agencies on combined APPs / APPs
- Mid-May (Actual date to be aligned with publication of the FY18 President's Budget): Agencies publish on agency websites FY 2018 APP / FY 2016 APP

Note: Agencies opting to publish the FY 2016 APP separate from the FY 2018 APP should submit for OMB review and clearance final draft FY 2016 APP prior to the FY 2018 APP.

What are the minimum performance information requirements agencies should address in their FY 2018 Annual Performance Plan (APP) and FY 2016 Performance Report (APR), given that agencies are required to align performance plans and reports to a strategic planning framework that is also in the process of being updated?

Agencies should provide a scaled back FY 2018 APP – consisting mainly of performance goals and indicators – that aligns performance goals with FY 2018 budget levels. Because agencies are in the process of updating their strategic goals and objectives, the FY 2018 APP does not need to show or describe in narrative form how performance goals align to the previous Administration's strategic goals, outcomes and objectives. Alignment between the agency's new strategic plan and its performance plans will be provided in the FY 2019 APP.

The FY 2016 APP should, at a minimum, compare actual performance results achieved with performance goals established in the agency's FY 2016 APP. Where appropriate, agencies should minimize narrative and use tables, graphs, figures, and charts to the extent possible (e.g., numbers over narrative) for reporting progress. Agencies may elect to publish their APP separate from the APP to help facilitate clearance and publication.

Last updated: April 12, 2017

OMB intends to update OMB Circular A-11 during the next cycle (anticipated Summer 2017) to clarify that in future transition years the APR will be published by the outgoing Administration. The APR separately from the APP, which will be published by the incoming Administration. The APR and APP will remain aligned in all other years.

How does development of the FY 2018 APP and FY 2019 APP relate to the Agency Strategic Plan?

Agencies establish performance goals, measures, and targets in the APP aligned to agency's objectives in the strategic plan for the level of performance to be achieved during the current year in which the performance plan is submitted as well as the budget year. The FY 2019 APP will be aligned to the new Strategic Plan covering FYs 2018-2022 and gives agencies the opportunity to update FY 2018 goals, measure, and targets if needed mid-year to reflect new leadership and management priorities. The table below illustrates the alignment across Agency Annual Performance Plans and Strategic Plans, and agency opportunities to prepare updated goals and measures to reflect leadership priorities.

2017 Strategic Reviews

Will OMB hold Strategic Review or FedStat meetings with agencies in 2017?

No. In lieu of the FedStat and Strategic Reviews that normally occur during the summer, OMB will meet with Chief Financial Officers (CFO) Act agencies and a limited number of other agencies to discuss Agency Reform Plans.

While there will be no formal OMB / Agency meeting to discuss findings from internal strategic reviews, OMB anticipates that agencies will still conduct strategic reviews or assessments of progress made towards strategic goals and objectives. Such reviews would leverage agency learning on the effectiveness of strategies to achieve desired impact since the 2014 strategic reviews, as well as findings from the development of the initial Enterprise Risk Management Risk Profile, to inform both agency reform plan proposals and new strategic priorities to be reflected in agency strategic and performance planning during 2017.

OMB / Agency FedStat and Strategic Review meetings will continue again in 2018.

Due to the pause on OMB / Agency Strategic Review meetings in 2017, what are agencies required to submit to OMB in June in advance of OMB / Agency Reform Plan meetings?

As part of OMB / Agency Reform Plan meetings, agencies will provide to OMB by June 30, 2017:

- Preliminary areas for Agency Reform Plan
- Progress on near-term actions to reduce the size of the civilian Federal workforce

Last updated: April 12, 2017

- Plan for maximizing employee performance
- High-level draft strategic plan (draft strategic goals and objective areas)
- Potential near-term/immediate actions

These discussions will serve as a forum for OMB to provide feedback, which agencies can incorporate into their draft Agency Reform Plans due in September to OMB. To frame the discussion for OMB / Agency Reform Plan meetings, agencies should provide a high-level draft of strategic plan. Agencies should consult with OMB Resource Management Offices (RMOs) on the necessary level of detail to appropriately frame the meetings, and agencies may discuss with OMB an alternate submission timeline of the draft strategic plan where needed.

Agencies should refer to Appendix I for a detailed timeline of submission dates and requirements to OMB during 2017 at <https://go.max.gov/omb/govreform>.

How should agencies incorporate human capital strategies into the draft Agency Strategic Plan submission to OMB in September 2017?

A draft outline of the FYs 2018-2022 Agency Strategic Plan is due to OMB with their FY 2019 Budget submission in September 2017. The recently published 5 C.F.R. Part 250 (subpart B) rule revision requires agencies to include human capital strategies as part of the update to Agency FYs 2018-2022 Strategic Plans. To minimize the administrative burden, the sections of the Agency Reform Plan that relate to workforce reduction planning may be included as part of the human capital strategies. Workforce reduction planning must also be reflected in each agency's Human Capital Operating Plan (HCOP), which are required by 5 C.F.R. Part 250. Forthcoming guidance will be provided to agencies for implementing requirements of the 5 C.F.R. Part 250 rule revision.

Are agencies required to submit to OMB in June or September 2017 draft Agency Priority Goal (APG) areas for the FYs 2018-2019 APG cycle?

No. Draft Agency Priority Goal areas are no longer due to OMB in June 2017 or September 2017. Forthcoming OMB guidance will be provided to agencies for establishing a new set of priority goals to be implemented for the FY 2018-2019 APG cycle that is aligned with agency leadership priorities and the President's Management Agenda.

Appendix 4: Components of Agency Reform Plans & the Government-wide Reform Plan

Last updated: April 12, 2017

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies.

The purpose of the Agency Reform Plan is for the head of each agency to identify how she/he proposes to improve the efficiency, effectiveness, and accountability of her/his respective agencies. As part of their planning efforts, agencies should focus on fundamental scoping questions (i.e. analyzing whether activities should or should not be performed by the agency), but also on improvements to existing business processes (i.e. proposals to improve the efficiency and effectiveness of agency operations and services through administrative mechanisms).

Format: Agencies have flexibility on how to organize their Agency Reform Plans, such as by bureaus/components, legislative vs. executive action, etc. Agencies may also embed these proposals into other parts of their FY 2019 Budget submission to OMB, provided that they also include a brief, consolidated summary highlighting which proposals comprise the Agency Reform Plan.

While agencies have flexibility on how to organize and present their Agency Reform Plans, the plan must include the following:

1. Proposals in one or more of the following four categories (additional detail in the following section):
 - a. Eliminate activities
 - b. Restructure or merge activities
 - c. Improve organizational efficiency and effectiveness
 - d. Workforce management: Improve performance, increase accountability, and reduce costs/size (must be included in all plans)

2. For each proposal, the following information:
 - a. **What:** Short explanation of the existing issue and rationale for the proposed change (1-4 paragraphs)
 - b. **Why:** Projected outcomes, both positive and negative, and affected stakeholders (including other agencies when applicable); cite evidence and evaluations where available (1-3 paragraphs)
 - c. **How:** Implementation timeline and risks, including administrative challenges; capacity needed for implementation; and any impacts on personnel, physical assets, and other agencies where applicable (1-3 paragraphs)
 - d. **Costs & Savings:** Projected implementation costs, savings and/or cost avoidance over five years, as well as ten years where feasible
 - e. **Statutory, Regulatory, and Administrative Analysis:** Agencies shall consult with their General Counsels and provide an analysis of the underlying statutory,

Last updated: April 12, 2017

regulatory, and other legal authorities at issue, litigation risk, and whether the proposal requires legislation or can be done administratively. If the proposal requires legislation, agencies should note if the legislative change would be necessary in appropriations language or in authorization language.

f. **Performance Goals:** At least one indicator the agency can use to track the proposal, along with a target and implementation date.

Agencies should also discuss relevant public feedback for each proposal, or provide an overall summary of public input collected by the White House through

<https://whitehouse.gov/reorganizing-the-executive-branch>

Of note, given agencies may ultimately require less real property as a result of these reforms and budget levels, agencies should consider their future real property needs and identify potential reductions to their real property inventory to increase operational efficiency. Agencies should reexamine their existing real property capital plans to identify when leases expire and determine whether the location of a position or group of activities could be performed elsewhere to reduce cost and/or improve service without a loss of quality. Consideration should be given to both labor availability and cost; costs associated with relocating employees who are subject to a transfer of function or reassignment to a new geographic area; and impact on local economies.

Cross-agency proposals: Agencies are also encouraged to recommend cross-agency proposals, such as merging programs or bureaus at different agencies. When including cross-agency proposals, agencies should note the views of the impacted agencies, if known, and where applicable identify the revised organizational design, such as name and functions of the consolidated entity. Simultaneously, OMB – in coordination with agencies that place reporting and compliance requirements on other agencies – will work with the CXO councils¹ to examine opportunities to reduce government-wide management requirements.

July discussions with OMB: For the July discussion with OMB, agencies only need to provide a high-level summary of initial areas where they are developing reform proposals. This high-level summary will enable better alignment between agencies, OMB and other White House offices before the agency's full submission in September and will be the focus of discussion during the OMB/Agency Reform Plan Meetings held in July (see item 3 in the previous section). OMB may provide additional guidance on the format of the June 30, 2017 submission.

¹ President's Management Council (PMC), Chief Acquisition Officers (CAO) Council, Chief Financial Officers (CFO) Council, Chief Information Officers (CIO) Council, Chief Human Capital Officers (CHCO) Council, Performance Improvement Officer (PIO) Council. For more information on these councils please see: <https://www.eoa.gov/portals/categories/101095>.

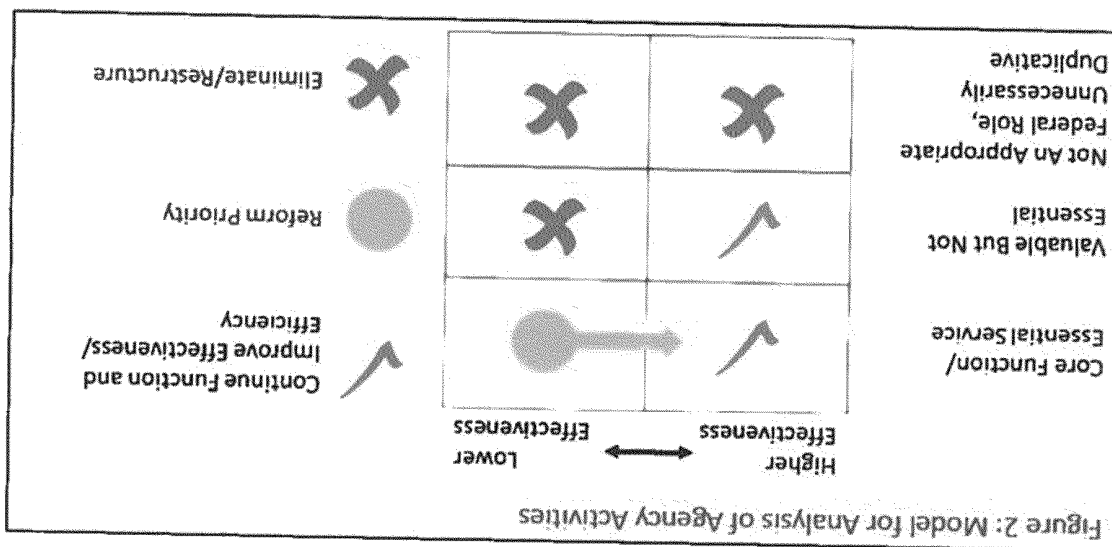
Last updated: April 12, 2017

Appendix 5: Analytical Framework

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies.

Analysis: Agencies have flexibility to determine how they choose to conduct their analysis, and should develop an analytical framework which looks at the alignment of agency activities with the mission and role of the agency and the performance of individual functions. This analytical framework should result in appropriate proposals in each of the four categories discussed in this section.

An example of a simplified analytical framework is included in Figure 2:



When justifying proposals to OMB, agencies should be prepared to discuss how they conducted their analysis and provide relevant evidence



Last updated: April 12, 2017

Appendix 6: Data Sources

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies.

When conducting analysis to develop their Agency Reform Plan, agencies should consider multiple sources of information. For instance, GAO publishes an annual Government Efficiency and Effectiveness: Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits report. As of March 2016, the executive branch had partially addressed 38%, and not addressed 15%, of the 459 actions identified by GAO to address the fragmentation, overlap, and duplication identified in its 2011-2016 reports. We anticipate GAO will publish a new annual duplication, overlap, and fragmentation report in late April 2017. While the executive branch actions recommended by GAO can be used as a source of information to inform the development of Agency Reform Plans, the research should not be limited to this source. Other data sources agencies can leverage when developing their analysis include:

GAO/GS:

- GAO Reports and Testimony and Office of Inspector General (IG) reports and findings

Internal agency:

- Agency workforce plans, examining executive/management/supervisory hierarchies and span of control as well as classification reviews, staffing levels, locations, grades, and position management;
- Agency internal studies, including inventories of workforce activities developed pursuant to the Federal Activities Inventory Reform Act;
- Findings from strategic foresight studies by the agency or other parts of the Federal government;
- Agency strategic review findings as required by Section 270 of OMB Circular A-11;
- Agency Strategic Plans, Agency Performance Plans, and Agency Performance Reports, to include analysis of historical trend data, as required by Sections 240 and 260 of OMB Circular A-11;
- Agency risk profiles as required by OMB Circular A-123;
- Agency real property profiles;
- Results of previous PortfolioStat, CyberStat, FedStat, HRSStat, and related reviews of mission-support functions;
- Information Resource Management (IRM) Strategic Plans; and
- Agency plans and reports in functional areas, such as the Acquisition, IT, and Human Capital Plan.

External:

- Cross-agency benchmarking data collected by GSA;
- FedScope.gov and Bureau of Labor Statistics;

- Federal Employee Viewpoint Survey (FEVS) data;
- Findings from completed program evaluations and other studies of agencies and the Federal government; and
- Rigorous studies from outside the Federal government of the strategies/interventions that are used in a given Federal program, even if the study is not specifically about that federal program, where relevant.

Last updated: April 12, 2017

Last updated: April 12, 2017

Appendix 7: Building and Using a Portfolio of Evidence to Improve Effectiveness

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies.

Policy decisions should be driven by evidence – evidence about what works and what does not, and evidence of where programs could be improved. Strong evidence should be acted upon, suggestive evidence should be considered, and evidence should be collected where it is weak so that better decisions can be made in the future. Agencies should use a broad set of activities to better integrate evidence and rigorous evaluation into budget, management, and policy decisions. In order to do so, they must develop the infrastructure and capacity to credibly build and use evidence and implement a culture that supports these activities.

What is a portfolio of evidence?

Agencies should use a range of analytical and management tools to learn what works and what does not for whom and under what circumstances, and to improve results. Evidence is the available body of facts or information indicating whether a belief or proposition is true or valid. Evidence can be quantitative or qualitative and may come from a variety of sources, including performance measurement, program evaluations, statistical series, retrospective reviews, and other data analytics and research. A portfolio of evidence may include:

- Impact evaluations, including randomized control trials and high-quality quasi-experimental designs that can answer questions about a program's impact relative to a counterfactual – i.e. whether the outcome was achieved because of the program or due to some other factor.
- Process or implementation evaluations that can answer questions about whether a program is being implemented as designed and whether the basic structure of a program is sound.
- Performance monitoring and measurement that can answer questions about program efficiency, outputs, and outcomes, but do not provide information about causal impact.
- Statistics and other forms of research and analysis, including basic science, that can provide insight into trends, strategies, and underlying principles and processes, but are less specific to particular program operations.

How should evidence be used?

The credible use of evidence in decision-making requires an understanding of what conclusions can and cannot be drawn from the available information. Evidence should be rigorous, relevant, transparent, independent, and generated in an ethical manner. Effective and efficient policies and programs require continual assessments of how they operate and how well they work. There are multiple ways to assess policies and programs, and the best approach or method depends on the specific information that is needed to answer key policy, programmatic, or operational questions, and on practical and methodological considerations. Evidence has varying degrees of credibility, and the strongest evidence generally comes from a portfolio of high-quality evidence covering different aspects and data point, i.e., from multiple sources and/or multiple studies covering different aspects and nuances of the topic. While many forms of evidence are complementary, some evidence that is useful for one purpose may not be useful for another.

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The learning agenda approach

Agencies are encouraged to adopt "learning agenda" approaches in which they collaboratively identify the critical questions that, when answered, will help their programs work more effectively and develop a plan to answer those questions using the most appropriate tools. The key components of a learning agenda approach are that agencies:

- Identify the most important questions that need to be answered in order to improve program implementation and performance. These questions should reflect the interests and needs of a large group of stakeholders, including people whom the program is designed to serve, program office staff and leadership, agency and Administrative leadership, program partners at state and local levels, and researchers, as well as legislative requirements and Congressional interests.
- Strategically prioritize which of those questions to answer within available resources, including which studies or analyses will help the agency make the most informed decisions. Identify the most appropriate tools and methods (e.g. evaluations, research, analytics, and/or performance measures) to answer each question.
- Implement studies, evaluations, and analysis using the most rigorous methods appropriate to the context.
- Disseminate findings in ways that are accessible and useful to program officials, policy-makers, practitioners, and other key stakeholders – including integrating results into performance measurement and strategic planning activities.
- Act on the results by using the information for continuous program improvement.

Building evidence capacity and infrastructure

- Operationalizing an effective evidence infrastructure requires a wide variety of capacities, and developing and supporting the use of evidence and evaluation in decision-making requires a coordinated effort between those charged with managing the operations of a program, including administrative data collection and maintenance, and those responsible for using data and evaluation to understand a program's effectiveness. It requires consistent messages from leaders at different levels of an agency – policy officials, program and performance managers, strategic planning and budget staff, evaluators, and statistical staff – to ensure that data and evidence are collected or built, analyzed, understood, and appropriately acted upon. Building the capacity to generate and use evidence means that agencies should consider how to:
- Ensure that staff with appropriate analytic skills and backgrounds are hired and supported
- Safeguard the ability of Federal principal statistical agencies to conduct objective statistical analyses, free of even the appearance that agency design, collection, processing, editing, compilation, storage, analysis, release, and dissemination processes may be manipulated
- Build or support autonomous evaluation offices to conduct rigorous, independent evaluations
- Invest in improving administrative data infrastructure, access, and quality, including collecting better quality data from grantees
- Make better use of existing administrative data to build evidence
- Utilize new tools and methods such as rapid cycle iterative evaluation and approaches that utilize behavioral insights
- Integrate evidence building into innovative grant programs
- Partner with other agencies to share data or jointly design/fund studies.

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Appendix 8: Workforce Reshaping Case Studies

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies.

This document includes case studies on how agencies have been working on developing their most efficient organization using several methods. Please visit www.opm.gov/reshaping for a detailed resource guide on workforce restructuring options.

Case Studies:

A. In 2013 the Department of Energy began an HR Service center consolidation across its national footprint. With a detailed total cost analysis as a baseline, followed by ongoing "Lean" process improvements and workforce re-training, the division has taken its national footprint from 17 centers to 5, reduced cost by 26%, increased efficiency by 41%, all while experiencing a workload increase of nearly 70%.

B. In 2012, the Department of State completed migration of human resources (HR) operational support and benefits management services from the high-cost metro Washington, DC, area to an existing federal complex in Charleston, S.C. State's management plan eliminated redundant activities embedded in State's DC bureaus, redesigned processes and established a new organization with a pay grade structure appropriate to the work. The Human Resource Service Center in Charleston realized land and labor cost savings and brought improvements in operating efficiencies and customer satisfaction. It was also the first federal human resources organization to achieve ISO 9001 certification in human resources operations in the federal government.

C. The Department of Defense has significant work underway to achieve efficiencies, spanning all manner of programs, processes, operations, and activities: In fiscal year (FY) 2015, the Deputy Secretary of Defense directed a 25% reduction in appropriations and personnel for the Department's Major Headquarters Activities, to be fully implemented by FY 2020. These reductions are being executed through business reorganizations and restructuring, process re-engineering, attrition of personnel, and utilization of human resources tools such as voluntary early retirement authority and voluntary separation incentive payments (VERA/VSSIP). DoD is also rationalizing and delaying management structures. It developed a framework that established governance and business rules, minimized the number of organizational management layers, and established target spans of control and supervisory ratios. One focus is on rebalancing grades as positions are vacated, driving the assignment of work to its proper lowest level. These activities are on-going, in conjunction with the Department's Headquarters reduction plan.

D. The Department of the Treasury Chief Human Capital Office is making up for shortfalls in Headquarters funding for its evaluation program responsibilities under the Human

Last updated: April 12, 2017

Capital Assessment and Accountability Framework through a peer-to-peer review structure. Bureaus (components) detail HR specialists for one to three weeks to assist the CHCO's Evaluations Manager in performing evaluations of bureaus other than their own. The office now meets its oversight obligations without incurring an estimated 2 FTE burden and headquarters while at the same time building breadth and depth in the details, improving their performance once returning to their home bureau.

F. The Department of Transportation (DOT) had the Federal Aviation Administration (FAA) centrally manage all workers' compensation activities in 2012. Since then, DOT has reduced the bill by almost \$11.7 million. This represents a 12% decrease. During the same time period, the government-wide bill increased by 4.47%. DOT reduced the number of employees receiving workers' compensation payments from 3,744 to 3,143, a reduction of 601 employees. During chargeback year 2016, FAA reduced the workers' compensation bill by almost \$3.1 million. This represents a 3.48% decrease. During the same time period, the government-wide bill increased by 0.47%. With the centralization, the other DOT Operating Administrations were able to reduce the staffing levels.

Action	Required Elements
Review and Update Formal Agency Policy	A. Review, update or create agency policy, procedures and guidance on how to address poor performance and conduct.
	B. Specifically review whether policies create unnecessary barriers for addressing poor performance.
	C. Remove steps not required in statute/regulation to streamline processes to the maximum extent.
	D. Once Administrative Leave Act implementing regulations are final, incorporate into policy the expectation to limit the use of unnecessary administrative leave.
	E. Provide clear guidance on performance improvement plans.
	F. Develop policy at agency level or highest major component level.
	G. Chief Human Capital Officer and General Counsel collaborate to create policy; consult with EEO Office and Labor Relations

Appendix 9: Additional Information and Resources on Maximizing Employee Performance

This document provides additional detail on OMB memorandum "Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce" which provides guidance on new requirements pursuant to the Presidential Memorandum (PM) issued January 23, 2017 "Hiring Freeze" and the Executive Order (EO) issued March 13, 2017 requiring a comprehensive plan to reorganize Executive Branch departments and agencies. By June 30, 2017, as an immediate and near-term government-wide workforce priority, all agencies must develop a plan to maximize employee performance by reviewing the systems and structures currently in place within their agencies to support managers in managing employee performance, and developing a timeline for improvement.

Format: Agencies have flexibility on how to organize their Plan to Maximize Employee Performance. At a minimum, agency plans must provide a timeline and implementation actions for accomplishing each of the following five actions:

- Review and Update Formal Agency Policy
- Provide Transparency Around the Performance Improvement Plan (PIP) Process
- Ensure Managers and Supporting HR Staff are Appropriately Trained
- Ensure Accountability in Manager Performance Plans
- Establish Real-Time Manager Support Mechanisms

The table below summarizes the specific elements that must be addressed for each action.

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<p>Provide Transparency Around the PIP Process</p> <p>A. Provide all supervisors a copy of the rules and guidance regarding PIPs.</p> <p>B. Emphasize in guidance that PIPs can be started at any point and not just at the end of the rating period.</p> <p>C. Maintain data on PIPs, including # of employees placed on them and # who successfully improve performance.</p>	<p>Ensure Managers and Supporting HR Staff are Appropriately Trained</p> <p>A. Provide training to all SES, supervisors, managers, team leads, and employee relations staff on managing employee performance and conduct.</p>	<p>Ensure Accountability in Manager Performance Plans</p> <p>A. Ensure that supervisors and managers are held accountable for managing employee performance and conduct.</p> <p>B. Review and update (if necessary) supervisor/manager performance plans to reflect this responsibility.</p>	<p>Ensure Real-Time Manager Support Mechanisms</p> <p>A. Identify approaches and plans for providing accessible and "just-in-time" expert assistance and guidance to managers who are addressing performance/conduct issues.</p> <p>B. Include a real-time forum (e.g., dedicated contact support lines) for managers to receive guidance on addressing performance or conduct issues that require immediate action.</p>
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Additional Resources: The following courses and studies are available to assist agencies. Please note that course titles and links may be updated in the coming weeks as part of ongoing HRU maintenance and enhancement efforts.

Federal Courses

Addressing and Resolving Poor Performance
 This 3 hour course is designed to build the supervisor, manager, or ER practitioner's skills in handling performance or work-habit problems. Learners will explore the importance of communicating and documenting performance concerns; and the challenges of shifting from counseling for improvement to implementing formal consequences, and how to take appropriate action to effectively address ongoing performance and work-habit problems.
http://www.hru.gov/Course_Catalog.aspx?cid=161&mpt=false

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Basic Employee Relations: Your Accountability as a Supervisor or Manager
This 3 hour course is designed to build the supervisor, manager, or ER practitioner's skills in handling performance and discipline problems. Students will explore the importance of communicating and documenting, and the procedures from counseling for improvement to implementing formal consequences, including how to take appropriate action to effectively address performance, leave and other disciplinary concerns. This course also covers a supervisor's or manager's accountability in basic performance management, labor relations, as well as accountability in the Senior Executive Service.
http://www.hru.gov/Course_Catalog.aspx?cid=240&mgr=false

Merit Systems Protection Board Web-based Training on Adverse Actions (2 hours)
This two hour course teaches about the various elements of an Adverse Action, and the responsibilities of the MSPB in deciding appeals from one. This included burden of proof, charges and types of misconduct, rules about penalties, and general guidelines.
http://www.hru.gov/Course_Catalog.aspx?cid=206&mgr=false

Coach for Success: How to Hold Performance Conversations Like A Pro
This 45 minute course describes the role of the supervisor/manager as coach, discusses how coaching can lead to an increase in job performance, and provides a model and processes for providing effective coaching. The course includes sample effective coaching discussions between managers and employees.
http://www.hru.gov/Course_Catalog.aspx?cid=113&mgr=false

Difficult Conversations
This 45 minute course was developed to assist agencies meet the requirements in 5 CFR 412.202. The goal of this course is to provide supervisors with the necessary skills to have the difficult conversation that is inherent when dealing with poor performance and to provide a safe environment to practice delivering difficult conversations.
http://www.hru.gov/Course_Catalog.aspx?cid=41&mgr=false

How to Rate Performance and Write an Effective Narrative
This 30 minute course describes how to rate performance objectives and behavioral performance consistently and fairly across employees at the end of the rating cycle. The course also addresses the importance of rater consistency and identifies common rating errors and how to avoid them. The narratives portion of the course provides tips on how to write effective, meaningful narratives and provides a step-by-step process for writing narrative.
http://www.hru.gov/Course_Catalog.aspx?cid=116&mgr=false

Federal Studies

OPM: Managing Federal Employees' Performance Issues or Misconduct
<https://www.chcoc.gov/sites/default/files/Managing%20Federal%20Employees%27%20Performance%20Issues%20or%20Misconduct.pdf>

Applying Performance and Conduct Standards To Employees With Disabilities
<https://www.eeoc.gov/facts/performance-conduct.html>

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Government Reports

[MSPB: Adverse Action: A Compilation of Articles \(2016\)](https://www.mspb.gov/studies/adverse_action_report/index_printfriendly.htm)

[MSPB: Addressing Poor Performers and the Law \(2009\)](http://www.mspb.gov/netsearch/viewdocs.aspx?docnumber=445841&version=446988)

[MSPB: Federal Supervisors and Poor Performers \(1999\)](http://www.mspb.gov/netsearch/viewdocs.aspx?docnumber=253646&version=253933&application=ACROBAT)

[MSPB: Removing Poor Performers in the Federal Service \(1995\)](http://www.mspb.gov/netsearch/viewdocs.aspx?docnumber=253662&version=253949&application=ACROBAT)

[MSPB: What is Due Process in Federal Civil Service Employment \(2015\)](http://www.mspb.gov/netsearch/viewdocs.aspx?docnumber=1166935&version=1171499&application=ACROBAT)

[GAO: Issues Related to Poor Performers in the Federal Workplace \(2005\)](http://www.gao.gov/assets/100/93352.pdf)

[GAO: Improved Supervision and Better Use of Probationary Periods Are Needed to Address Substandard Employee Performance \(2015\)](http://www.gao.gov/assets/670/668339.pdf)

OMB April 12, 2007 Memorandum

KEY REQUIREMENTS/DELIVERABLES:

Today's OMB guidance requires all agencies to:

- **Immediate** – Begin taking actions to:
 - Achieve near-term workforce reductions and cost savings (including planning for funding levels in the President's FY 2018 Budget Blueprint);
 - Develop a plan to maximize employee performance; and
 - An Agency Reform Plan.
- **By June 30, 2017** – Develop a plan to maximize employee performance.
- **By June 30, 2017** – Submit an initial, high-level draft of the Agency Reform Plan to OMB that includes:
 - The areas the agency is developing for their reforms;
 - Progress on near-term workforce reduction actions (note above action item); and
 - A plan to maximize employee performance (note above action item).
- **July 2017** – Agencies and OMB meet to discuss June submissions.
- **September 2017** – Submit an Agency Reform Plan to OMB (as part of the agency's FY 2019 Budget submission to OMB).
- **Beginning February 2018** – OMB will begin tracking progress on the Government-wide Reform Plan

PLAN TO IMPLEMENT THE FY 2018 PRESIDENT'S BUDGET

- OMB directs agencies to identify workforce reductions over a four-year period (FY 2018 through 2022) consistent with discretionary outyear levels included in the FY 2018 Budget this spring and forthcoming OMB guidance on FY 2019 Budget submissions.
- OPM will provide streamlined templates to agencies for requesting approval to offer Voluntary Early Retirement Authority and Voluntary Separation Incentive Payments (VERA/VSIP); OPM will provide expedited reviews for most requests within 30 days.
- Eliminating unnecessary vacant positions can begin immediately.
- Agencies should undertake a review of all employees on administrative leave because of performance deficiencies or misconduct to determine whether those individuals should be returned to work and assigned alternative duties, or subjected to other appropriate action, up to and including removal.

COMPONENTS OF AGENCY REFORM PLANS (and Government-wide Reform Plan)

- Agencies should develop an analytical framework that looks at the alignment of agency activities with the mission and role of the agency and the performance of individual functions.
- This framework should result in appropriate proposals in four categories:
 - Eliminate activities (an agency, programs or activities);
 - Restructure or merge;
 - Improve organizational efficiency and effectiveness; and
 - Workforce management (improve performance, increase accountability and reduce costs).

PLAN TO MAXIMIZE EMPLOYEE PERFORMANCE

Agencies should:

- Take near-term actions to ensure that the workforce they retain and hire is as effective as possible.
- Determine whether their current policies and practices are barriers to hiring and retaining the workforce necessary to execute their missions as well appropriately managing and, if necessary, removing poor performers.
- Ensure that performance expectations are appropriately rigorous, aligned to the work that needs to be done and the grade of the employee, and effectively communicated (regular, ongoing performance feedback should be provided).
- Ensure that managers have the tools and support they need to manage performance effectively to achieve high-quality results.
- Ensure that managers recognize high performers, help employees identify and address areas in need of improvement, and move quickly to address employees who are not meeting performance expectations.

By June 30, 2017, as an immediate and near-term government-wide workforce priority, all agencies must develop a plan to maximize employee performance by reviewing the systems and structures currently in place within their agencies to support managers in managing employee performance, and developing a timeline for improvement.

At a minimum, agencies must address the timeline and implementation actions for agencies to accomplish the following five actions:

1. Review and Update Formal Agency Policy
Agency timelines must include a process for reviewing and updating (or creating, if one does not already exist) the agency's policy, procedures, and guidance on how to address poor performance and conduct.
2. Provide Transparency around the Performance Improvement Plan (PIP) Process
 - Agency submissions must include a timeline for providing all supervisors a copy of the rules and guidance regarding PIPs.
 - Agencies will maintain data on PIPs, including the number of employees placed on them and the number who successfully improve performance.
3. Ensure Managers and Supporting HR Staff Are Appropriately Trained
Agency submissions must include a timeline for all Senior Executive Service (SES) members, supervisors, managers, team leads, and any personnel involved in employee relations to complete training on managing employee performance and conduct.
4. Ensure Accountability in Manager Performance Plans
Agency submissions must include a timeline for how they will ensure that supervisors and managers are held accountable for managing employee performance and conduct, including reviewing and updating (if necessary) supervisors' and managers' performance plans.

5. Establish Real-Time Manager Support Mechanisms

Agency submissions must include a timeline for agencies to identify approaches and plans for providing accessible and "just-in time" expert assistance and guidance to managers who are addressing performance/conduct issues.

These mechanisms should include a real-time forum (e.g., dedicated contact support lines) for managers to receive guidance on addressing performance or conduct issues that require immediate action.

Agencies ultimately have discretion to design these mechanisms. The following Manager Support Board structure would meet this requirement:

- a. Establish a Manager Support Board comprised of internal experts on employee and labor relations, who may request policy guidance or technical assistance from OPM or other lead agencies if needed;
- b. Have at least one non-HR senior management member with experience/expertise to help provide coaching/support on techniques and approaches for managing employee performance, even if not on the specific case;
- c. Operate as close to the regional/division level as feasible;
- d. Publicize points of contact where managers can go to receive prompt guidance or provide frequent and regular open-meeting times for any managers with questions to receive immediate guidance on appropriate next steps; and
- e. Establish regular check-ins with managers currently working on a case to ensure either the employee is improving or steps are being taken towards an appropriate disciplinary action.

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Appendix 8: Workforce Reshaping Case Studies

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- C. The Department of Defense has significant work underway to achieve efficiencies, spanning all manner of programs, processes, operations, and activities: In fiscal year (FY) 2015, the Deputy Secretary of Defense directed a 25% reduction in appropriations and personnel for the Department's Major Headquarters Activities, to be fully implemented by FY 2020. These reductions are being executed through business reorganizations and restructuring, process re-engineering, attrition of personnel, and utilization of human resources tools such as voluntary early retirement authority and voluntary separation incentive payments (VERA/VSIP). DoD is also rationalizing and delayering management structures. It developed a framework that: established governance and business rules, minimized the number of organizational management layers, and established target spans of control and supervisory ratios. One focus is on rebalancing grades as positions are vacated, driving the assignment of work to its proper lowest level. These activities are on-going, in conjunction with the Department's Headquarters reduction plan.
- D. The Department of the Treasury Chief Human Capital Office is making up for shortfalls in Headquarters funding for its evaluation program responsibilities under the Human

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Capital Assessment and Accountability Framework through a peer-to-peer review structure. Bureaus (components) detail HR specialists for one to three weeks to assist the CHCO's Evaluations Manager in performing evaluations of bureaus other than their own. The office now meets its oversight obligations without incurring an estimated 2 FTE burden and headquarters while at the same time building breadth and depth in the detailees, improving their performance once returning to their home bureau.

- E. The Department of Transportation (DOT) had the Federal Aviation Administration (FAA) centrally manage all workers' compensation activities in 2012. Since then, DOT has reduced the bill by almost \$11.7 million. This represents a 12% decrease. During the same time period, the government-wide bill increased by 4.47%. DOT reduced the number of employees receiving workers' compensation payments from 3,744 to 3,143, a reduction of 601 employees. During chargeback year 2016, FAA reduced the workers' compensation bill by almost \$3.1 million. This represents a 3.48% decrease. During the same time period, the government-wide bill increased by 0.47%. With the centralization, the other DOT Operating Administrations were able to reduce the staffing levels.

To: Sasser, Erika[Sasser.Erika@epa.gov]; Evarts, Dale[Evarts.Dale@epa.gov]
From: Page, Steve
Sent: Fri 3/31/2017 8:54:15 PM
Subject: Fwd: US-China Environmental Cooperation

FYI

Sent from my iPhone

Begin forwarded message:

From: "Dunham, Sarah" <Dunham.Sarah@epa.gov>
Date: March 31, 2017 at 4:52:42 PM EDT
To: "DeMocker, Jim" <DeMocker.Jim@epa.gov>, "Shoaff, John" <Shoaff.John@epa.gov>
Cc: "Page, Steve" <Page.Steve@epa.gov>, "Grundler, Christopher" <grundler.christopher@epa.gov>, "Harvey, Reid" <Harvey.Reid@epa.gov>, "Lewis, Josh" <Lewis.Josh@epa.gov>, "Shaw, Betsy" <Shaw.Betsy@epa.gov>
Subject: FW: US-China Environmental Cooperation

fyi

From: Nishida, Jane
Sent: Friday, March 31, 2017 4:47 PM
To: Dunham, Sarah <Dunham.Sarah@epa.gov>; Shapiro, Mike <Shapiro.Mike@epa.gov>; Breen, Barry <Breen.Barry@epa.gov>; Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Cleland-Hamnett, Wendy <Cleland-Hamnett.Wendy@epa.gov>; Kavlock, Robert <Kavlock.Robert@epa.gov>; Minoli, Kevin <Minoli.Kevin@epa.gov>
Cc: Jackson, Ryan <jackson.ryan@epa.gov>
Subject: US-China Environmental Cooperation

Dear Colleagues,

I am writing to update you on the initial planning for the U.S.-China Strategic & Economic Dialog (S&ED).

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

This year's S&ED will be hosted by the U.S. and the timing will be announced after President Trump's meeting with his Chinese counterpart Xi Jinping on April 6-7 in

Mar-a-Lago, Florida. The TYF will be hosted by China later this summer and may be done by DVC (same as last year). We also expect China's Minister of Environmental Protection to invite Administrator Pruitt to China for the Joint Committee on Environmental Cooperation (JCEC) later this year.

In order to prepare for requests from the State Department, my staff has reached out to your offices to begin the process of identifying noteworthy achievements from this past year and developing EPA's priorities for the 2017 S&ED and TYF. We recognize that it may be difficult to put forward ideas for new or expanded work with China given the current uncertainties in EPA's budget and staffing levels. However there will be an expectation for deliverables for S&ED and TYF and we want to be prepared to offer the best ideas possible. We will convene a meeting to discuss proposals and then put together the best strategy for continued environmental cooperation with China for the Administrator's consideration.

If you have any questions or suggestions, please feel free to contact me. Thank you.

Jane

To: Vizian, Donna[Vizian.Donna@epa.gov]
From: Showman, John
Sent: Tue 11/22/2016 2:38:57 PM
Subject: Real World Check In

EPA Pushes Ahead With Hiring, Rules As Trump 'Landing' Team Arrives

November 21, 2016

EPA is pushing ahead with new staff hiring and implementing as many pending regulations as possible even as President-elect Donald Trump's "landing" team arrives for briefings on the transition to a new administration, though the agency is deferring fiscal year 2018 budget planning and refraining from initiating new rulemakings.

According to recent updates on EPA's internal transition website, reviewed by *Inside EPA*, transition coordinators have been designated for each headquarters program office, such as the air, water, waste and toxics divisions, and the regional offices. These officials "will serve as conduits for all transition-related information and provide support in developing briefing materials for the President-elect's new team," according to the website.

As previously reported, Shannon Kenny, deputy associate administrator in EPA's Office of Policy, is EPA's representative on the White House-led Agency Transition Director's Council, and is "working closely with EPA senior career leadership to ensure our goal of a smooth, efficient and effective transition is met."

A list of "Frequently Asked Questions" on the agency's website says that many Obama administration appointees will continue to work at the agency until Trump's inauguration on Jan. 20.

EPA says if any appointees leave before that date, they will be replaced with acting officials "as would normally occur. Following the inauguration and until new leaders are confirmed or appointed, the incoming President will have designated an eligible official to serve as the Acting Administrator or the functions and duties of the position will be performed by the EPA official identified in the Order of Succession established by Executive Order. Most Assistant-Administrator level positions will be filled by acting officials, typically the principle deputy official."

The landing team, expected to arrive at EPA as soon as Nov. 22, will work with the current administration to obtain "key information" and receive briefings on the agency's work, according to the website.

While that work is ongoing, EPA says it “has no plans to halt hiring during this Administration,” meaning it could push ahead with efforts to increase its staffing levels. It is unclear how Trump might respond to such a move, given that he has vowed to cut back EPA's budget, which would likely mean reduced staff levels. EPA also says that “Career ladder promotions are not impacted by any transition” and will continue as planned.

EPA is also pushing ahead with implementing as much ongoing work as it can. “President Obama has made it clear he expects us to keep working on current priorities throughout the end of this Administration. In terms of regulations, we are keeping, to the extent feasible, to the schedule in the Regulatory Agenda.”

The website adds that EPA is continuing the hiring and rulemaking work under the terms and conditions of its current continuing resolution funding and will do so until Congress approves a FY17 appropriation. “This means no new activities may be initiated and available funding will be limited,” EPA says.

The agency is also not working on a FY18 budget proposal, saying it will be up to the Trump administration to write that request and that the Obama EPA is crafting only a “continuing services” budget. “The new administration will make budget decisions following the Presidential inauguration in January. We anticipate a streamlined budget process in the spring that will result in the new Administration's [FY18] budget request,” EPA says.

Transition Coordinators

EPA reiterates on its website that all relevant transition work and communication with the Trump landing team must be done through the designated transition coordinators who will brief the incoming administration.

Under “important reminders,” the website says staff who receive calls or emails from Trump's team must forward them to the senior career official in their program or region, who will work with Transition Director Kenny.

If staff receive any calls from the media or other external organizations about the transition then they must direct them to the public affairs directors in the regions or the communications directors at headquarters, EPA says.

A full list of [the EPA transition coordinators](#) published on the website shows the staffers in each program and regional office that will work with the landing team. Some offices only have one staffer allocated, but most have two staff -- a transition coordinator and a backup, both across headquarters and also the regions.

The list of transition officials includes at least 10 staffers from EPA Administrator Gina McCarthy's office, including Nancy Grantham for the Office of Policy Affairs, Thomas Brennan for the Office of Public Engagement and Environmental Education, and the team of Andrea Barbery and Carolyn Levine for the Office of Congressional and Intergovernmental Relations that is the primary contact with Congress.

Most other divisions have two staff dedicated to the transition effort, for example with Josh Lewis and Carissa Cyran representing the Office of Air & Radiation, Andrew Mojica and Melissa Chun for the Office of Chemical Safety & Pollution Prevention, and Karen Gude and Christine Ruf for the Office of Water.

EPA's website indicates that all 10 regions have two staffers dedicated to the transition effort, from Jacqueline LeClair and Brenda Haslett in Region 1 to Ann Williamson and Kendra Tyler in Region 10.

The transition effort appears to have been in the works for months, as the internal website also includes a Sept. 12 quote from EPA Chief of Staff Matt Fritz on preparing for a new administration.

"As we head into the last quarter of this Administration, we still have incredibly important work to do on behalf of the American people. At the same time, we have a responsibility to prepare for the presidential transition that will occur in January," Fritz said. -- *Anthony Lacey* (alacey@iwpnews.com)

John L Showman III, Acting Deputy Assistant Administrator

Office of Administration and Resources Management

US Environmental Protection Agency

202-564-5341

To: Vizian, Donna[Vizian.Donna@epa.gov]; Showman, John[Showman.John@epa.gov]; Minoli, Kevin[Minoli.Kevin@epa.gov]
From: Newton, Cheryl
Sent: Mon 11/21/2016 10:37:50 PM
Subject: Fwd: Answers to Questions Raised Recently

Just a quick FYI as similar emails may be being shared among all the unions. Thanks
Sent from my iPhone

Begin forwarded message:

From: "Nam, Ed" <nam.ed@epa.gov>
Date: November 21, 2016 at 2:16:29 PM CST
To: "Newton, Cheryl" <Newton.Cheryl@epa.gov>, "Sanders, Amy" <Sanders.Amy@epa.gov>, "Ballotti, Doug" <ballotti.douglas@epa.gov>, "Guerriero, Margaret" <guerriero.margaret@epa.gov>, "Harris, Michael" <harris.michael@epa.gov>, "Sypniewski, Bruce" <sypniewski.bruce@epa.gov>, "Hyde, Tinka" <hyde.tinka@epa.gov>, "Korleski, Christopher" <korleski.christopher@epa.gov>, "Nelson, Leverett" <nelson.leverett@epa.gov>, "Henry, Timothy" <henry.timothy@epa.gov>
Subject: FW: Answers to Questions Raised Recently

Hi all,

This is an email that Mike Mikulka, President, AFGE Local 704 sent out to the bargaining unit employees regarding the next administration. I found it quite interesting.

-Ed

From: Mikulka, Michael
Sent: Friday, November 18, 2016 10:59 AM
Subject: Answers to Questions Raised Recently

I have been asked a lot of questions recently which may require some

prognostication on my part. Please consider that while we may not know the future, the past may have raised the hairs on the back of some of our necks. I have identified the questions I was asked and a response to each. Thank you to John O'Grady, President AFGE Council 238 for his views on these matters.

In Solidarity!

Michael Mikulka, President

AFGE Local 704

312-886-6760

QUESTION: Can Congress and the President eliminate the EPA?

ANSWER: The answer is yes and no.

YES: The YES part of the answer is that the Administration may decide to 're-organize' the U.S. EPA into, for example, the U.S. Department of the Interior, or even several organizations dealing with environmental and safety issues into one massive Agency, such as the Food and Drug Administration (FDA), Occupational Safety and Health Administration (OSHA), U.S. Environmental Protection Agency (U.S. EPA), U.S. Army Corps of Engineers (USACE), etc.

This type of action occurred under President George W. Bush when his Administration, along with Congress, established the Department of Homeland Security (DHS) shortly after September 11, 2001. The DHS was created through the integration of all or part of 22 different federal departments and agencies into one Department, including the United States Citizenship and Immigration Services (USCIS), United States Customs and Border Protection (CBP), United States Coast Guard (USCG), Federal Emergency Management Agency (FEMA), United States Immigration and Customs Enforcement (ICE), Transportation Security Administration (TSA), and United States Secret Service (USSS). Properly forming

the DHS took years, and many of the Agencies that were combined have suffered greatly from mismanagement, loss of visibility (e.g., FEMA), and budget cuts.

The Administration and Congress could also effectively 'eliminate' the U.S. EPA by drastically cutting its budget and staffing levels, and placing 'riders' on budgetary bills.

NO: The NO part of the answer as to whether or not the Administration and Congress could eliminate the U.S. EPA has to do with the sheer span of the U.S. EPA's authority and responsibilities. The Agency is currently responsible for over 25 major statutes, including, but not limited to the Clean Air Act (CAA); Clean Water Act (CWA); Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, or Superfund); Emergency Planning and Community Right-to-Know Act (EPCRA); Endangered Species Act (ESA); Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); Marine Protection, Research, and Sanctuaries Act; National Environmental Policy Act (NEPA); Oil Pollution Act (OPA); Resource Conservation and Recovery Act (RCRA); Safe Drinking Water Act (SDWA); and the Toxic Substances Control Act (TSCA), among others.

If the Administration and Congress tried to 'eliminate' the U.S. EPA, each and every one of these laws would need to be addressed and either repealed or modified significantly. Additionally, there would be significant court challenges from Non-governmental Organizations (NGOs or 501(c) (3) organizations such as Environmental Justice, National Wildlife Federation, Sierra Club, etc.), as well as (hopefully), major public outcry.

QUESTION: If so, how long will it take?

ANSWER: This all depends upon what the Administration proposes and how the Democrats, Independents, and Republicans respond. First of all, the new Administration must 'staff' up with its own political appointees.

There are four basic types of political appointments: **1,212** Presidential Appointments with Senate Confirmation requiring a congressional hearing and a

confirmation vote of the full Senate under the Appointments Clause of the United States Constitution. We must keep in mind that it takes **sixty (60) votes** in the Senate to approve any political appointees for the new Administration, including any Federal judges to the Supreme Court. There are also about **350** Presidential Appointments without Senate Confirmation, most of which are concentrated in the Executive Office of the President. There are also about **680** non-career Senior Executive Service (SES) consisting of career officials. There are also **1,403** Schedule C Appointments who serve in confidential or policy roles immediately subordinate to other appointees.

- For further information about Political Appointments, please click on this link: [**Political Appointments**](#).
- For further information about Political Appointments requiring Senate Confirmation, please click on this link: [**Presidential Appointments with Senate Approval**](#).

QUESTION: Do we get unemployment if the EPA is eliminated?

ANSWER: It depends upon the circumstances, including the length of any furlough.

Unemployment Compensation

The Administration and Congress could decide to furlough everyone for a length of time under thirty (30) days. Federal employees may then be eligible for unemployment compensation. The law requires a 30-day notice of furloughs lasting 30 days (22 calendar days) or less, and employees are entitled to respond to the proposals orally or in writing, entitled to a representative or attorney, and may appeal an adverse ruling to the Merit Systems Protection Board (MSPB). As a practical matter, employees will have few grounds to challenge the furlough proposals, unless the agency failed to give proper notice or committed another due process violation. The MSPB has ruled that it would not second-guess management's discretion in conducting a short-term furlough unless an employee can show disparate treatment among similarly situated employees. *Clark v. OPM*, 24 MSPR 224, 226 (1984).

Some employees may be eligible for unemployment benefits during furloughs, but the rules are state-specific, and employees would need to consult their appropriate state or District of Columbia office. The Department of Labor also has a website with information regarding [unemployment compensation for federal employees](#).

Reduction in Force (RIF)

A furlough of more than 30 calendar days, or of more than 22 discontinuous work days, is also a RIF action. Different rules apply to furloughs extending beyond 30 calendar days or more than 22 discontinuous work days. They must be handled under reduction-in-force (RIF) procedures, which require a minimum 60 days specific written notice of the furlough action. RIF procedures require that the agency notify employees of their retention standing and the basis for the retention standing (competitive area, service, position title, series, and grade, etc), and the agency must make information related to the RIF action available for inspection. Employees who are furloughed under RIF procedures also have MSPB appeal rights. The RIF procedures are also triggered when an administrative furlough of 22 workdays or less is extended for budgetary reasons.

The U.S. Office of Personnel Management develops policy and provides guidance to Federal agencies regarding Reduction in Force (RIF). This page serves as a portal to assist you in locating pertinent information and content related to RIF in the Federal Government.

When an agency must abolish positions, the RIF regulations determine whether an employee keeps his or her present position, or whether the employee has a right to a different position. **The regulatory requirements governing reduction in force are contained in Title 5, Code of Federal Regulations, Part 351.** Federal agencies must follow the procedures contained in the Code of Federal Regulations when conducting a RIF. The law provides that OPM's RIF regulations must give effect to four factors in releasing employees: (1) tenure of employment (e.g., type of appointment); (2) veterans' preference; (3) length of service; and (4) performance ratings.

Severance Pay

Severance pay is authorized for full-time and part-time employees who are involuntarily separated from Federal service and who meet other conditions of eligibility.

To be eligible for severance pay, an employee must be serving under a qualifying appointment, have a regularly scheduled tour of duty, have completed at least 12 months of continuous service, and be removed from Federal service by involuntary separation for reasons other than inefficiency (i.e., unacceptable performance or conduct).

To be eligible for severance pay, an employee must have completed at least 12 months of continuous service by the date of separation. This continuous service may consist of one or more civilian Federal positions held over a period of 12 months without a single break in service of more than 3 calendar days. The positions held must have been under one or more qualifying appointments; one or more non-qualifying temporary appointments that precede the current qualifying appointment; or an appointment to a position in a non-appropriated fund instrumentality of the Department of Defense or the Coast Guard that precedes the current qualifying appointment in the Department of Defense or the Coast Guard, respectively.

The basic severance pay allowance consists of (1) One week of pay at the rate of basic pay for the position held by the employee at the time of separation for each full year of creditable service through 10 years; (2) Two weeks of pay at the rate of basic pay for the position held by the employee at the time of separation for each full year of creditable service beyond 10 years; and (3) Twenty-five percent of the otherwise applicable amount for each full 3 months of creditable service beyond the final full year.

For further information, please click on this link: [Severance Pay](#).

QUESTION: Do we even have any rights if this happens?

ANSWER: Yes, of course. It would depend upon whether or not the Administration and Congress furloughed federal employees for less than 30 days or more than 30 days (RIF). It would also depend upon whether or not the Administration and Congress decided to merge the U.S. EPA into a larger Agency or Department. We have to wait and see what happens and then approach the matter in consultation with our AFGE Headquarters and our law firm on retainer with AFGE Council 238.

QUESTION: When could we expect RIFs in a Trump Presidency?

ANSWER: It is still too soon to speculate on whether or not there will be RIFs in a Trump Presidency. I am sure that part of the thought process would be the overall effect of such an action by a new Administration and what it may do to the re-electability of party candidates. There are also considerations by individual U.S. Senators and Congressional Representatives who have a number of Federal employees (as well as retired Federal employees) in their states or Congressional Districts.

QUESTION: What job types are in danger if a Reduction in Force (RIF) happens?

ANSWER: It is too soon to tell exactly what might be involved in a RIF. The regulations governing a RIF are somewhat complex, and there are many ways to go about a RIF.

It is important to know, however, that in a RIF, each agency or department has the right to decide what positions are abolished, whether a RIF is necessary, and when the RIF will take place. Once the agency makes these decisions, the retention regulations then determine which employee is actually reached for a RIF's action. The RIF regulations must be used before separating or demoting an employee because of an organizational reason such as reorganization, including lack of work, shortage of funds, insufficient personnel ceiling, or the exercise of certain reemployment or restoration rights.

If the Agency abolishes positions, it does not always require the use of RIF procedures. The agency has the right to avoid a RIF action by simply reassigning an employee to a vacant position at the same grade or pay without regard to the employee's rights under the RIF regulations. The vacant position may be in the same or in a different classification series, line of work, and/or geographic location.

The "**Summary of Reassignment Under the Regulations**" includes additional information on reassignment.

To: Vizian, Donna[Vizian.Donna@epa.gov]; Showman, John[Showman.John@epa.gov]
From: Bloom, David
Sent: Fri 11/18/2016 2:52:31 PM
Subject: FW: Call on SES QRB Moratorium this Friday with Beth Cobert

Donna/John,

I don't know why I received this email but I assume that OARM will be on the call. I wasn't planning to listen in unless you suggest otherwise. David

From: CobertBF [mailto:CobertBF@opm.gov]
Sent: Wednesday, November 16, 2016 6:42 PM
To: CobertBF <CobertBF@opm.gov>
Subject: Call on SES QRB Moratorium this Friday with Beth Cobert

Colleagues:

Earlier this evening I sent the email below inviting members of your staff to join a call this Friday at 12pm ET on the SES QRB moratorium. While the invite is for a staff level call targeting Chiefs of Staff, Senior Advisors and CHCOs, please know that your participation is also welcome.

The official memo and guidance on the moratorium will be released this Friday, and we will follow up to share that material with you and your staff then.

Thanks,

Beth

Dear Colleagues,

During Presidential election years, the U.S. Office of Personnel Management (OPM) has

followed an established practice to impose a government-wide moratorium on the processing of agencies' Senior Executive Service (SES) Qualifications Review Board (QRB) cases. The moratorium is imposed so that incoming agency heads may exercise their prerogative to make or approve executive resource decisions that will impact their agencies' performance during their tenure.

Last week, the President requested letters of resignation from all non-termed presidential appointees be submitted by December 7, 2016. Accordingly, as will be noted in a memo and guidance to be released this week, OPM will be imposing a government-wide moratorium on all SES QRB cases, effective December 7, 2016. Individual exceptions to the moratorium will be considered on a case-by-case basis.

As OPM prepares to release guidance on the moratorium process, we ask you to:

1) Join us for an informational call:

• **Date:** Friday, November 18

• **Time:** 12pm ET

• **Purpose:** Steve Shih, Deputy Associate Director for Senior Executive Services and Performance Management, and I will provide information on the SES moratorium and process for requesting case-by-case exceptions.

• **Dial-in:** A limited number of call lines will be available. We ask that you please dial in as an agency team from one line to the extent possible. **Number: 888-989-4617**
Participant code: 2784396

2) Inform OPM of the SES cases you intend to submit.

• Agencies should email OPM's SES Operations at SEERS@opm.gov a list of (A) your anticipated SES QRB cases that will be submitted to OPM prior to December 7, 2016 and (B) cases you intend to seek exceptions for after the moratorium goes in effect.

I look forward to speaking with you this Friday.

Thanks,

Beth

To: Gunning, Paul[Gunning.Paul@epa.gov]
Cc: Giordano, Michael[giordano.michael@epa.gov]; Birnbaum, Rona[Birnbaum.Rona@epa.gov]
From: Sarofim, Marcus
Sent: Thur 8/17/2017 8:57:33 PM
Subject: FW: Metrics Paper
[Metrics Paper v05-aaf.docx](#)

Hi Paul,

We wanted to share the latest draft of the metrics paper with you: Rona reviewed it and we updated based on her comments, Allen has reviewed it and this has his comments in it, and Bill is reading it and sounded positive but won't finalize his comments until tomorrow.

Because Mike's last day is a week from tomorrow, we may submit it to Nature Climate Change next week, but obviously we would incorporate any further suggestions that you have at any time until we have a version ready for resubmission after reviewer comments (and who knows when that would be).

Thank you,

-Marcus

Marcus C. Sarofim, PhD
phone: 202-343-9993
WJC East 4410M
Environmental Scientist
Climate Science & Impacts Branch

From: Fawcett, Allen
Sent: Thursday, August 17, 2017 3:58 PM
To: Sarofim, Marcus <Sarofim.Marcus@epa.gov>; Irving, Bill <Irving.Bill@epa.gov>
Cc: Giordano, Michael <giordano.michael@epa.gov>; Birnbaum, Rona <Birnbaum.Rona@epa.gov>
Subject: RE: Metrics Paper

This looks great Marcus. I just have one technical edit on the discussion of Ramsey discounting.

Thanks,

Allen

Allen A. Fawcett, Ph.D.

Chief, Climate Economics Branch

U.S. Environmental Protection Agency

Office: (202) 343-9436

Cell: (202) 412-5116

From: Sarofim, Marcus

Sent: Tuesday, August 15, 2017 1:00 PM

To: Fawcett, Allen <Fawcett.Allen@epa.gov>; Irving, Bill <Irving.Bill@epa.gov>

Cc: Giordano, Michael <giordano.michael@epa.gov>; Birnbaum, Rona
<Birnbaum.Rona@epa.gov>

Subject: Metrics Paper

Bill, Allen,

Mike G & I have completed a draft of the long-promised metrics paper, and Rona has reviewed it, so we were hoping you might be able to take a quick look at the paper and give us your thoughts. I will note that Mike's last day in the office is a week from Friday, so the sooner we can get feedback, the better.

I'm pretty excited about our results – I think they'll be a valuable contribution to the metrics discussion. We are hoping to submit the paper to Nature Climate Change, so the paper is (mostly) formatted appropriately.

Thank you,

-Marcus

(Rona, Mike: you'll see that where Rona's comments were easy changes, I went ahead and updated the text and deleted the comment, but left in some of the comment bubbles in other places)

Marcus C. Sarofim, PhD
phone: 202-343-9993
WJC East 4410M
Environmental Scientist
Climate Science & Impacts Branch

To: Irving, Bill[Irving.Bill@epa.gov]; Fawcett, Allen[Fawcett.Allen@epa.gov]; Franklin, Pamela[Franklin.Pamela@epa.gov]; Banks, Julius[Banks.Julius@epa.gov]
Cc: Gunning, Paul[Gunning.Paul@epa.gov]; Bacanskas, Lisa[Bacanskas.Lisa@epa.gov]
From: Birnbaum, Rona
Sent: Wed 8/9/2017 3:24:59 PM
Subject: FW: Request for comments on IPCC AR6 WG1,2+3 report outlines
[WGI chapter outline.pdf](#)
[WGII chapter outline.pdf](#)
[WGIII chapter outline.pdf](#)

Let me know if you have comments on this and we can send combined set to Andy. Lisa B will help combine comments to share with ORD.

State Dept may have contacted you separately and if so, even if responding directly to State, it would still be good to let ORD know what are comments are.

From: Miller, Andy
Sent: Wednesday, August 09, 2017 11:04 AM
To: Winner, Darrell <Winner.Darrell@epa.gov>; Grambsch, Anne <Grambsch.Anne@epa.gov>; Weaver, Chris <Weaver.Chris@epa.gov>; Birnbaum, Rona <Birnbaum.Rona@epa.gov>; Peterson, Jeff <Peterson.Jeff@epa.gov>; Scheraga, Joel <Scheraga.Joel@epa.gov>; Wolverton, Ann <Wolverton.Ann@epa.gov>
Subject: FW: Request for comments on IPCC AR6 WG1,2+3 report outlines

Any comments? They're due back to David by Aug 17. Feel free to solicit input from others in EPA.

If you do have comments, please send them to me and I'll consolidate and send to David.

C.A. (Andy) Miller

Associate Director for Climate

Air, Climate, and Energy Research Program

US EPA Office of Research and Development

Los Angeles, CA

Miller.andy@epa.gov

(213) 244-1809

(919) 699-3072 (cell)

From: David Reidmiller [<mailto:dreidmiller@usgcrp.gov>]
Sent: Monday, August 07, 2017 2:49 PM
To: SGCR Principals and Plus Ones <sgcr-principals-plus-ones-group@usgcrp.gov>
Cc: Alpert, Alice <AlpertA@state.gov>
Subject: Request for comments on IPCC AR6 WG1,2+3 report outlines

This message is being sent on behalf of the Department of State

Hello SGCR colleagues,

At the September 6-10 meeting of the Intergovernmental Panel on Climate Change (IPCC), government representatives will discuss and approve outlines for the contributions of Working Groups I (The Physical Science Basis), II (Impacts, Adaptation, and Vulnerability), and III (Mitigation of Climate Change).

Please take a look at the attached outlines and evaluate for red line issues, concerns on how topics are framed, and whether you would like to see any additional content included. Note, there will be limited ability to make edits, and if the content is acceptable no response is needed. The outlines are indicative; while authors will use the bulleted topics as a guide, they may decide to expand or limit the scope based upon available literature.

Please forward to any colleagues with relevant experience/equities and send comments via email to alperta@state.gov (cc'd) **by COB Thursday, August 17**. And let me know if there are any questions, concerns, etc. Thank you very much.

All the best,

Alice Alpert

--

You received this message because you are subscribed to the Google Groups "SGCR Principals and Plus Ones" group.

To unsubscribe from this group and stop receiving emails from it, send an email to sgcr-principals-plus-ones-group+unsubscribe@usgcrp.gov.

To post to this group, send email to sgcr-principals-plus-ones-group@usgcrp.gov.

To view this discussion on the web visit https://groups.google.com/a/usgcrp.gov/d/msgid/sgcr-principals-plus-ones-group/CAN7Vwj%2BicbzTxupUdCdv-OoG2qyEAX%3DGiTuEYny-Rs_p3YBgVQ%40mail.gmail.com.

ipcc
INTERGOVERNMENTAL PANEL ON climate change

IPCC WORKING GROUP II – ELEVENTH SESSION
Montreal, 7 – 8 September 2017

WG-II:11th /Doc.2
(4.VIII.2017)
Agenda Item: 2
ENGLISH ONLY

**PROPOSED CHAPTER OUTLINES OF THE WORKING GROUP II CONTRIBUTION
TO THE IPCC SIXTH ASSESSMENT REPORT (AR6)**

(Submitted by the Co-Chairs of Working Group II)

IPCC Secretariat

c/o WMO • 7bis, Avenue de la Paix • C.P. 2300 • 1211 Geneva 2 • Switzerland
telephone : +41 (0) 22 730 8208 / 54 / 84 • fax : +41 (0) 22 730 8025 / 13 • email : IPCC-Sec@wmo.int • www.ipcc.ch



WORKING GROUP II CONTRIBUTION TO THE IPCC SIXTH ASSESSMENT REPORT

Proposed Outline

Summary for Policymakers [20 pages]

Technical Summary [40 pages]

Chapter 1: Point of departure and key concepts [30 pages]

- Changing policy context (including Paris Agreement, SDGs, etc.); AR5 and SR findings and critical messages, goals of this report
- The significance of sectoral and regional climate risks to natural and human systems in the context of culture, values, ethics, identity, behaviour, and historical experience
- The climate risk framework used in this report encompassing hazard, exposure, and vulnerabilities
- The significance of adaptation (from incremental to transformational), in addressing climate change risks, including adaptation responses and outcomes
- Detection and attribution of both climate impacts and adaptation responses
- Understanding dynamic climate risks from scenarios that reflect multiple interacting drivers
- Enabling conditions for effective adaptation including governance and economic aspects
- Climate change responses and their interactions with sustainable development pathways
- Opportunities for enhancing climate resilient development pathways

THEME 1: Risks, adaptation and sustainability for systems impacted by climate change

Chapter 2: Terrestrial and freshwater ecosystems and their services [60 pages]

- Point of departure, key findings of other reports, organised by biomes including freshwater systems, taking into account ecological disequilibria
- Historical and paleontological aspects of climate change impacts and risks
- Trends in critical ecosystems including detection and attribution of observed impacts and responses
- Projected hazards and exposure (link to WGI), including extreme events and interactions of multiple climatic, non-climatic and anthropogenic stressors at relevant temporal and spatial scales
- Projected impacts: species, ecosystem structure and biodiversity, emergence of novel communities, process rates, functions, and the implication for their services, at relevant temporal and spatial scales
- Vulnerability and resilience, enablers and limits to natural and planned adaptation, and maladaptation
- Assessing risks, opportunities, costs, and trade-offs including consideration of scenarios and impacts of adaptation and mitigation responses
- Planned adaptation and mitigation for management of risk within the SDG and other relevant policy contexts, informed by cultural, ethical, identity, economic and behavioural dimensions
- Lessons from case studies

Chapter 3: Ocean and coastal ecosystems and their services [60 pages]

- Point of departure, key findings of other reports, organised by systems, taking into account ecological disequilibria
- Historical and paleontological aspects of climate change impacts and risks
- Trends in critical ecosystems including detection and attribution of observed impacts
- Projected hazards and exposure (link to WGI), including extreme events and interactions of multiple climatic, non-climatic and anthropogenic stressors at relevant temporal and spatial scales
- Projected impacts: species, ecosystem structure and biodiversity, emergence of novel communities, process rates, functions, and the implication for their services, at relevant temporal and spatial scales
- Vulnerability and resilience, enablers and limits to natural adaptation
- Assessing risk, opportunities, costs, and trade-offs including consideration of scenarios and impacts of adaptation and mitigation responses
- Planned adaptation and mitigation for management of risk within the SDG and other relevant policy contexts, informed by cultural, ethical, identity, economic and behavioural dimensions
- Lessons from case studies

Chapter 4: Water [60 pages]

- Observed and projected hydrological changes on basin and watershed scales and water related hazards including floods, droughts and landslides
- Key short, medium and long term risks to water security in the context of critical sectors (including food-energy-water-health nexus) and different users and systems under alternative scenarios
- Adaptation responses including cooperation in different climatic zones to water security risks with co-benefits for sustainable development including consideration of impacts of adaptation and mitigation responses
- Attribution of transboundary and other international and intra-national problems relating to shared water resources
- Approaches to achieving resilience in water systems and assessments of outcomes, costs, benefits, and where maladaptations were evident
- Lessons from case studies

Chapter 5: Food, fibre and other services from managed ecosystems [60 pages]

- Climate-driven historical changes in services provided by managed ecosystems, detection and attribution of impacts and responses, including impacts of adaptation and mitigation responses, considering key findings of other reports
- Current and projected risks for food and nutrition security, food systems on land and in the ocean, and the food-energy-water-health nexus
- Current and projected risks for wood, fibre and natural products, such as medicinal organisms, rubber and dyes
- Adaptation options for different managed ecosystems across scales and regions including limits and barriers, knowledge systems and aspects of sustainable development
- Competition for the use of land and ocean, including conflicts with indigenous rights to land and water bodies, and other tradeoffs in the context of adaptation and mitigation responses
- Current and projected risks for provisioning and cultural ecosystem services with considerations of ethics and identity
- Lessons from case studies

Chapter 6: Cities, settlements and key infrastructure [60 pages]

- Changes in the international policy architecture for settlements since AR5
- Interactions of climate risks with urban and rural change processes including food-energy-water-health nexus
- Risk-reducing infrastructure and services (including ecological and social), their deficits, and implications for vulnerability, exposure and adaptation
- Detection and attribution of observed impacts and responses and projected risks from climate change under alternative scenarios including energy systems, transport and industry
- Adaptation options, adaptive capacity, responses and outcomes, including equity considerations and links to mitigation
- Institutional, financial, and governance structures that enable governance for climate resilient and sustainable settlements, cities and key infrastructure
- Lessons from case studies

Chapter 7: Health, wellbeing and the changing structure of communities [50 pages]

- Health and wellbeing impacts, including detection and attribution
- Projected risks to health and wellbeing under alternative scenarios, including food-energy-water-health nexus
- Vulnerable populations and communities
- Adaptation options, limits to adaptation, and their social, environmental and economic implications
- Observed impacts and projected changes in migration, displacement, and trapped populations, and linkages to adaptation
- Psychological, social, and cultural dimensions
- Lessons from case studies

Chapter 8: Poverty, livelihoods and economic development [60 pages]

- Detection and attribution of observed impacts and responses
- Projected climate change risks under alternative development scenarios as differentiated by economic opportunity and shifting livelihoods
- Observed and projected risks and losses and the challenges for equity and sustainability
- Adaptation options, adaptive capacity and actions, and their outcomes for resilience and transformation, focusing on low-income households and communities
- Opportunities for development including tradeoffs between adaptation and mitigation, economic diversification, equity, and sustainability
- Lessons from case studies

THEME 2: Regions**Common elements across all *regional* chapters (guidance points not an outline)**

- Information on selected regional and sub-regional climate characteristics and zones
- Summary Table and/or figures with WGI and WGII information, combined with risk assessment (e.g., SREX SPM.1)
- Detection and attribution of observed impacts and responses in natural and human systems on diverse time scales
- Current sectoral climate risks, including specific regional and sub-regional considerations related to land, coasts and regional oceans
- Cultural and psychological dimensions (values, attitudes, ethical aspects, identity, behaviours)

- Observed impacts and projected risks including identifying key risks and residual risks as well as development pathways depending on rate and level of climate change, including extremes and sea level rise
- Adaptation options, from incremental to transformational, including opportunities, enablers, limits, barriers, and adaptive capacity
- Governance and economic aspects including legal, institutional, financing, price responses, and trade
- Cross sectoral, intra-regional, and inter-regional issues including consideration of temporal scale
- Interaction of risks and responses to climate change with sustainable development pathways
- Lessons from case studies

Chapter 9: Africa [50 pages]**Chapter 10: Asia [50 pages]****Chapter 11: Australasia [30 pages]****Chapter 12: Central and South America [50 pages]****Chapter 13: Europe [40 pages]****Chapter 14: North America [40 pages]****Chapter 15: Small Islands [30 pages]****THEME 3: Overview of sustainable development pathways: integrating adaptation and mitigation****Chapter 16: Key risks across sectors and regions [40 pages]**

- Synthesis of observed impacts and responses, including detection and attribution
- Key risks and avoided impacts under a range of climate and development pathways, across temporal and spatial scales
- Limits to adaptation and residual risks in natural and human systems
- Reasons for Concern across scales
- Lessons from case studies at different scales, including trans-boundary risks

Chapter 17: Decision-making options for managing risk [40 pages]

- Decision-making and governance for managing risk across multiple scales, institutions, and systems
- Drivers of decision-making: values, perceptions, differential power and influence, behaviour, and incentives
- Costs and non-monetized loss, benefits, synergies, and trade-offs, including distributional aspects and the social cost of carbon
- Lessons from case studies at different scales, including issues of governance and finance

Chapter 18: Climate resilient development pathways and transformation* [40 pages]

- Synergies and trade-offs of sustainable development (including SDGs), adaptation and mitigation
- Strategies that strengthen resilience and reduce inequalities
- Assessing progress, including adaptation, in the context of the Global Stocktake
- Lessons from case studies at different scales

**connection to WG III*

CROSS-CHAPTER BOXES

- Antarctica [5 pages]
- Arctic [10 pages]
- Biodiversity hotspots (land, coasts and oceans) [10 pages]
- Cities by the sea [10 pages]
- Deserts and semi-arid areas [5 pages]
- Mountains [5 pages]
- Tropical forests [10 pages]

ANNEX I: Regional Atlas

ANNEX II: Glossary

ANNEX III: List of Acronyms

ANNEX IV: List of Contributors

ANNEX V: List of Reviewers

INDEX

To: Gunning, Paul[Gunning.Paul@epa.gov]
From: Krieger, Jackie
Sent: Mon 4/24/2017 8:49:30 PM
Subject: FW: OAP transition papers
[Transition 2016 Issue Paper Climate Beyond CPP 10-19-16.docx](#)
[Transition 2016 Issue Paper Post-Paris 10-19-16.docx](#)
[Transition 2016 Issue Paper Biomass 10-19-16.docx](#)
[Transition 2016 Issue Paper GHG Emission Trends 10-19-16.docx](#)
[Transition 2016 Issue Paper Montreal Protocol 10-19.docx](#)

It's the third paper.

From: Krieger, Jackie
Sent: Wednesday, October 19, 2016 5:30 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Cc: VonDemHagen, Rebecca <VonDemHagen.Rebecca@epa.gov>; Clarke, Deirdre <clarke.deirdre@epa.gov>
Subject: OAP transition papers

Hi Josh, Carissa: Attached are the four OAP transition papers with OP's comments addressed (most of them we took – a few not but can easily explain). They are in clean version and ready to go. Also attached is our first draft of the Montreal Protocol paper. We'd really like to see the CPP and oil and gas papers when they are ready to share. Thanks!

P.S. There is one date missing in the Beyond CPP paper – as soon as we get it from OAQPS, we'll let you know.

Jackie Krieger / Chief of Staff / Office of Atmospheric Programs / U.S. EPA / O: 202-343-9905 / C: 202-236-3934

To: Gunning, Paul[Gunning.Paul@epa.gov]
Cc: Kocchi, Suzanne[Kocchi.Suzanne@epa.gov]
From: Fawcett, Allen
Sent: Fri 3/24/2017 5:45:46 PM
Subject: Fwd: REEP letters
[Revesz et al REEP.pdf](#)
[ATT00001.htm](#)
[Gayer Viscusi REEP.pdf](#)
[ATT00002.htm](#)

FYI, here are two interesting new papers on global vs domestic SCC one by Revesz et al, and the by Gayer and Viscusi. Kate has a nice summary below.

Allen

Allen A. Fawcett, Ph.D.

Chief, Climate Economics Branch

U.S. Environmental Protection Agency

Office: [\(202\) 343-9436](#)

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Begin forwarded message:

From: "Shouse, Kate" <Shouse.Kate@epa.gov>
Date: March 24, 2017 at 12:46:43 PM EDT
To: "Fawcett, Allen" <Fawcett.Allen@epa.gov>
Subject: REEP letters

Hi, Allen. Gloria Helfand sent me copies of the two letters from REEP (attached). Revesz et al write in support of global values and state they are justified (1) because strategic use of a global value can induce international reciprocity; (2) for ethical reasons; (3) for legal reasons (UNFCCC obligates the US to account for global effects and that domestic laws either require or give discretion); and (4) because the domestic values lack transparency (they cite a forthcoming paper about spillover effects and the lack of treatment of spillover effects in the models).

Gayer and Viscusi respond that they find the magnitude of the effect of reciprocity is

unclear and recommend finding a “more rigorous approach to assessing magnitude of reciprocity effects than assuming global benefits equal domestic benefits.” They also observe that “adopting a global benefits measure that either treats benefits to noncitizens as being equivalent to benefits to citizens or asserts that international cooperation leads to complete reciprocity for all US policies establishes a dangerous precedent for other policy areas.” They identify illegal drugs, terrorism risks, and infectious diseases as examples of other policy areas in which application of global values would result in “inordinate policy costs”.

To: Shouse, Kate[Shouse.Kate@epa.gov]; Gunning, Paul[Gunning.Paul@epa.gov]; Kocchi, Suzanne[Kocchi.Suzanne@epa.gov]; Fawcett, Allen[Fawcett.Allen@epa.gov]; Birnbaum, Rona[Birnbaum.Rona@epa.gov]; Sarofim, Marcus[Sarofim.Marcus@epa.gov]
Cc: Harvey, Reid[Harvey.Reid@epa.gov]; Krieger, Jackie[Krieger.Jackie@epa.gov]; Clarke, Deirdre[clarke.deirdre@epa.gov]
From: VonDemHagen, Rebecca
Sent: Wed 3/1/2017 10:12:10 PM
Subject: FW: Summary and notes from 2/28 House Science subcommittees hearing on Social Cost of Carbon
[House Science SCC Hearing 2-28-17 summary Q&Afinal.docx](#)
[House Science SCC Hearing 2-28-17 summary.docx](#)

Hi All – Attached are OCIR's notes on the SCC hearing yesterday. Let me know if you have any questions.

Thanks,

Rebecca

Rebecca von dem Hagen

Office of Atmospheric Programs

U.S. Environmental Protection Agency

(202) 343-9445

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From: Davis, Matthew

Sent: Wednesday, March 01, 2017 4:50 PM

To: Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Saltman, Tamara <Saltman.Tamara@epa.gov>; Mroz, Jessica <mroz.jessica@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; VonDemHagen, Rebecca <VonDemHagen.Rebecca@epa.gov>; Krieger, Jackie <Krieger.Jackie@epa.gov>; Clarke, Deirdre <clarke.deirdre@epa.gov>; Sutton, Tia <sutton.tia@epa.gov>; Burch, Julia <Burch.Julia@epa.gov>

Cc: Haman, Patricia <Haman.Patricia@epa.gov>; Byrne, Andrew <Byrne.Andrew@epa.gov>

Subject: Summary and notes from 2/28 House Science subcommittees hearing on Social Cost of Carbon

In case it is of interest, I've attached a summary and Q&A notes that Andy and I pulled together from yesterday's hearing before the House Committee on Science, Space and Technology Subcommittees on Environment and Oversight on the Social Cost of Carbon (SCC). Nothing terribly new or noteworthy from the hearing, except maybe a bit broader interest in a carbon tax, but I thought I would send it around and people can feel free to take a look or ignore it.

Thanks,
Matthew

Matthew H. Davis

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To: Gunning, Paul[Gunning.Paul@epa.gov]
Cc: Fawcett, Allen[Fawcett.Allen@epa.gov]; Sarofim, Marcus[Sarofim.Marcus@epa.gov]; Kopits, Elizabeth[Kopits.Elizabeth@epa.gov]
From: Shouse, Kate
Sent: Thur 1/12/2017 2:55:42 PM
Subject: handouts for 11 am mtg today
[NAS_report release briefing slides.pdf](#)
[one pager for Sarah v2.docx](#)

Hi, Paul. Allen and I put together the attached one-pager for our meeting with Sarah at 11 am today. We envision using the one-pager plus slides 17-24 of the NAS briefing, which provide relevant diagrams and a little more detail about the recommendations. I'll drop off a copy to your office now and will bring copies for all to the meeting. Please let me know if you have any comments or concerns.

Thanks,
Kate

To: Gunning, Paul[Gunning.Paul@epa.gov]; Kocchi, Suzanne[Kocchi.Suzanne@epa.gov]; Fawcett, Allen[Fawcett.Allen@epa.gov]
Cc: Kopits, Elizabeth[Kopits.Elizabeth@epa.gov]
From: Shouse, Kate
Sent: Mon 12/5/2016 5:32:36 PM
Subject: NAS talking points
[Transition Paper SC-GHG 11 14 16.docx](#)
[NAS talking points.docx](#)

Hi, Paul. As we discussed at the management meeting, I have drafted some talking points about the forthcoming National Academies report on social cost of carbon. Other than the expected briefing and public release dates, we do not have any information about the report or communications strategies. Elizabeth verified that this is the latest but can chime in if there's anything to add. We haven't heard from EOP about process but expect they will reach out and develop talking points after the sponsors' briefing and before the public release.

Also attached is the latest draft of the SC-GHG Transition Paper that OP sent to Shannon. It's not clear whether they sent this version to the Landing Team but sending in case it would be useful when briefing Sarah.

Please let me know if you have any questions or need anything else. Thanks,
Kate

Talking points:

National Academies forthcoming report on social cost of carbon

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Background

Ex. 5 - Deliberative Process

The Social Cost of Carbon: Maintaining the Integrity of Economic Analysis—A Response to Revesz et al. (2017)

Ted Gayer, Brookings Institution, Washington, DC
W. Kip Viscusi, Vanderbilt University, Nashville, TN

In our article, “Determining the Proper Scope of Climate Change Benefits in U.S. Regulatory Analyses: Domestic versus Global Approaches” (Gayer and Viscusi 2016), we advocated for the standard benefit–cost analysis practice that the preferences that have standing for U.S. policies are those of U.S. citizens. Our approach to assessing the benefits of climate change policies highlighted the roles of altruism and reciprocity, both of which will influence the domestic benefits of climate policies. We also emphasized that climate change is a global problem requiring a global solution.

The thoughtful letter by Revesz et al. (2017) in this issue of the journal does not address the role of altruism. Rather it emphasizes the importance of reciprocity as a justification for the use of a global social cost of carbon (SCC). Indeed, the letter appears to suggest that the use of a global SCC will foster reciprocity regardless of the policies that are actually adopted. But we find that the magnitude of the effect of reciprocity is unclear.

Based on the estimates of the Interagency Working Group on Social Cost of

Carbon (2010), the domestic share of the global benefits of greenhouse gas (GHG) reductions is 7–23 percent. Justifying the use of global benefits based on reciprocity implicitly assumes that every GHG-reducing policy effort adopted by the United States will generate substantial GHG reductions elsewhere. More specifically, if the U.S. share of GHG benefits is 7 percent, then U.S. efforts would need to lead to a GHG reduction worldwide that is more than fourteen times the reduction in the United States in order to justify using the global benefits measure for U.S. citizens. Similarly, if the domestic share of GHG benefits is as high as 23 percent of the global benefits, then U.S. efforts would need to lead to a GHG reduction worldwide that is more than four times the reduction in the United States in order to justify the global benefits measure for U.S. citizens. However, there is no empirical basis for the particular level of reciprocity that is being assumed in the SCC calculation; in theory, the reciprocity value could be greater or less than this amount, or even negative.

Our article provided a systematic review of the statutory guidance and executive orders for a variety of U.S. regulatory policies (e.g., the Clean Air Act). As we indicated in our article, “we are not suggesting that the CAA (Clean Air Act) prohibits the computation of a global SCC.” However, the CAA as well as other environmental statutes and executive orders all focus on benefits to U.S. citizens. We believe that adopting a global benefits measure that either treats benefits to noncitizens as being equivalent to benefits to citizens or asserts that international cooperation leads

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to complete reciprocity for all U.S. policies establishes a dangerous precedent for other policy areas. Indeed, one could make similar reciprocity arguments for a wide range of policies with international implications, such as those directed at illegal drugs, risks of terrorism, and infectious diseases, which would result in inordinate policy costs. For these and other international challenges, there needs to be a more rigorous approach to assessing the magnitude of reciprocity effects than simply assuming that global benefits equal domestic benefits.

October 4, 2016.

References

- Gayer, Ted, and W. Kip Viscusi. 2016. Determining the proper scope of climate change benefits in U.S. regulatory analyses: Domestic versus global approaches. *Review of Environmental Economics and Policy* 10(2):245–63.
- Interagency Working Group on Social Cost of Carbon. 2010. Technical support document: Social cost of carbon for regulatory impact analysis, under Executive Order 12866. Washington, DC: U.S. government.
- Revesz, Richard L., Jason A. Schwartz, Peter H. Howard, Kenneth Arrow, Michael A. Livermore, Michael Oppenheimer, and Thomas Sterner. 2017. The social cost of carbon: A global imperative. *Review of Environmental Economics and Policy* 11(1):172–173.

Letters to the Editor

The Social Cost of Carbon: A Global Imperative

Richard L. Revesz, Jason A. Schwartz,*
Peter H. Howard, New York University School
of Law, New York, NY

Kenneth Arrow, Stanford University, Stanford, CA

Michael A. Livermore, University of Virginia
School of Law, Charlottesville, VA

Michael Oppenheimer, Woodrow Wilson
School of Public and International Affairs and
Department of Geosciences, Princeton University,
Princeton, NJ

Thomas Sterner, College de France, Paris, France,
and University of Gothenburg, Gothenburg, Sweden

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nyu.edu

To solve the unprecedented global commons problem posed by climate change, all nations must internalize the global externalities of their emissions (van der Ploeg 2016); otherwise, collective abatement efforts will never achieve an efficient, stable climate outcome. Yet lately, the U.S. government's standard valuation of carbon pollution's externalities has come under attack in both academic journals and courtrooms. This metric—the “social cost of carbon” (SCC)—is used to analyze and set climate policy, and since 2010 federal agencies have emphasized global valuations of climate damages (Interagency Working Group on Social Cost of Carbon 2010).

Recently a handful of economists and policy experts have instead begun advocating domestic-only valuations (Dudley and Mannix 2014; Fraas et al. 2016), based on dubious arguments. The same arguments have been repeated in two major challenges in federal court against energy efficiency standards and the regulation of power plants' carbon emissions. Even the U.S. Forest Service has proposed making important decisions about the management of coal mines based on the domestic-only SCC value. Finally, in a recent article published in this journal, Gayer and Viscusi (2016) try to make an economic and legal case for a domestic-only SCC. We are writing this letter to express our strong support for the continued use of a global SCC.

There are several important arguments for federal agencies to use a global SCC. First, the United States benefits tremendously if other countries set policy based on global rather than local effects (Howard and Schwartz 2015). Modern game theory predicts that strategic use of the global SCC by the United States can induce international reciprocity (Axelrod 1984; Madani 2013; Howard and Sylvan 2015; Howard and Schwartz, forthcoming). Ethical frameworks similarly instruct that the United States should model the actions it wants all other countries to take (Kant 1997). Indeed, the Obama administration has strategically incorporated the global SCC into climate negotiations, most recently harmonizing its

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global SCC valuation with Canada and Mexico. Reverting to a domestic-only metric would risk signaling that the United States disregards the global effects of its actions, which could undermine the climate commitments of other countries.

From a legal perspective, not only does international law—the U.N. Framework Convention on Climate Change—commit the United States to account for global effects, but domestic laws like the Clean Air Act and the National Environmental Policy Act also either require or give discretion to agencies to consider global climate costs (Howard and Schwartz, forthcoming). In fact, a recent ruling by a federal circuit court of appeals confirms that key statutes give agencies discretion to consider the global consequences of U.S. climate policies (Zero Zone v. Dept. of Energy 2016).

Finally, from a practical standpoint, a domestic SCC lacks transparency. The models underlying the SCC oversimplify and wrongly assume that the United States is an island unaffected by migration, national security, global economic disruptions, and other cross-border externalities. Many seemingly “foreign” climate damages would actually spill over to harm the United States (Howard and Schwartz, forthcoming). Thus, focusing on only the domestic SCC value is deeply misleading.

October 1, 2016.

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House Committee on Science, Space, and Technology, Subcommittees on Environment and Oversight

Hearing: At What Cost? Examining the Social Cost of Carbon (SCC)

2/28/17

Hearing Purpose: The purpose of this hearing is to examine the methods and parameters used to establish the social cost of carbon. Witnesses will discuss the models used to determine the value for the social cost of carbon and how the process can be improved.

Witness List:

- Dr. Ted Gayer, Vice President and Director of Economic Studies, Brookings Institute
- Dr. Kevin Dayaratna, Senior Statistician and Research Programmer, Center for Data Analysis, The Heritage Foundation
- Dr. Michael Greenstone, Milton Friedman Professor in Economics, the College, and the Harris School of the University of Chicago; Director of the Interdisciplinary Energy Policy Institute, University of Chicago; Director of Energy & Environment Lab, University of Chicago Urban Labs
- Dr. Patrick Michaels, Director, Center for the Study of Science, Cato Institute

Majority Attendees: Reps. Biggs (AZ), LaHood (IL), Banks (IN), Marshall (KS), Chair Smith (TX), Babin (TX), Rohrabacher (CA), Higgins (LA), Posey (FL), Weber (TX)

Minority Attendees: Reps. Bonamici (OR), Beyer (VA), McNerney (CA), Crist (FL)

Overview:

Majority themes:

- Previous administration failed to follow OMB guidelines when calculating the SCC, on the discount rate and in including global benefits instead of just domestic benefits.
- Obama administration ignored science and manipulated the calculation to support the policies that they wanted to pursue as part of justifying their political agenda.
- SCC-based regulations hold back American innovation and industry, hurts the economy.
- EPA has not been open and honest, pursuing one-sided agenda to calculate SCC and regulate.
- Three models (FUND, PAGE, DICE) that underlie the SCC are flawed, old, inappropriate.
- Members should support Rep. Jenkins' bill to disallow agencies from using the SCC.
- Several members argued that carbon is not even a threat at all.
- Some discussion, from both parties, of a carbon tax as an alternative to regulation, most witnesses supported that approach.

Minority Themes:

- GAO and independent peer review by NAS have supported the SCC calculation and agreed it was underpinned with sound economic analysis and methodology.
- Reducing carbon emissions and economic development go hand in hand (e.g. renewable energy)
- The SCC is rooted in overwhelming scientific consensus on climate change science and a government-wide review of the economic impacts.

- The SCC metric was mandated by a court decision delivered to the Bush administration from a statute signed by Reagan, for government to predict the cost of damages from climate change.
- Majority arguments on SCC are similar to those put forward by the tobacco industry against the Social Cost of Smoking calculation that former Chairman Waxman calculated and put forward.
- The administration followed the rulemaking guidelines, and was transparent, using the SCC calculation to estimate the cost and benefits for over 69 actions and rules across government.
- It is proper for federal government to look at global impact of domestic energy policy, as it may affect international negotiations. And, US should be a global leader.

Witness Statements:

Dr. Gayer, Brookings Institute:

- SCC is conceptually appropriate, but its calculation is uncertain and challenging.
- SCC should only account for impacts to US as opposed to globally. The regulatory arena where SCC is used includes renewable fuel standards, fuel economy for cars, etc. on domestic activities. The main executive order, 12866, makes clear that the reference point to look at is US citizenry, and the CAA also specifies to protect the American public.
- Domestic impact/benefit is much smaller than global impact/benefit: $\frac{1}{4}$ to $\frac{1}{14}$ th the global benefit. If EPA had used domestic impact/benefit of reducing CO₂, the cost of the Clean Power Plan would have been more than the benefits.
- It might make sense if there was reciprocity in the foreign countries' reducing emissions similarly, but that is not likely, not happening based on Paris Agreement country-specific plans.
- Doesn't make sense to hide foreign policy decisions about helping foreign countries in a number (SCC) used to justify domestic regulations.
- Supports carbon tax to more transparently "regulate" the climate pollutant domestically.

Dr. Dayaratna, Heritage Foundation:

- The Obama Administration used three flawed models: FUND, PAGE, DICE.
- The previous administration manipulated the calculation in order to support their agenda: on the discount rate, the lengthy time horizon, and the equilibrium climate sensitivity (ECS).
- When the Heritage Foundation ran the economic model with a 7% discount rate instead of what the EPA used at 5%, they found that the costs far outweighed the benefits. He re-ran the DICE model using a shorter time horizon, of 150 years, instead of 300 years, and generated SCC that was 25% of what EPA had calculated with the longer time horizon.
- Unexplored question in SCC calculation is whether there are positive benefits to carbon dioxide, or negative benefits from reducing a ton of carbon emissions, and the answer is yes. The FUND model includes agricultural benefit from more CO₂ in the air, and when he re-ran the numbers they found that it did have disbenefits from CO₂ reductions because of less plant fertilization and other reasons. Many jobs would be lost, large loss of GDP, mostly from agricultural industry.

Dr. Greenstone, U. Chicago, Energy Policy Institute:

- SCC appropriately measures benefits of regulations reducing carbon dioxide emissions.
- He co-lead with Cass Sunstein working group across the whole federal government to develop the SCC, a range with a central tendency of \$21/ton. Used already-published economic models,

transparent process. CA, IL, MN, ME, NY, WA, Canada, Mexico have all adopted the SCC.

- Critics say 2.5, 3, 5% discount rates are too low, but if we pick too high, it is imposing climate damages on our grandchildren. Should be set at return of similar investment over time. If there is pretty good certainty of what will happen then higher %, i.e. stock market return of 5.3% over the past 50 years. If there is a lot of uncertainty, as with climate change, it makes more sense to use a lower number along the lines of the return of gold, which people hold to weigh against bad times/fluctuations of the stock market (3% return on gold past 50 years).
- Global vs. Domestic argument: each ton of carbon emitted by foreign countries impacts domestic environment and citizens, so it makes sense to calculate social costs to include this.
- Need to continue to update SCC based on law, sound science, and economic understanding.

Dr. Michaels, Cato Institute, Contributor to IPCC:

- Humans are not as sensitive to warming, and recent models show that there is less certainty for forecast for high end warming from IPCC.
- Row and Baker climate sensitivity paper is a very large range $\sim 7^{\circ}\text{C}$, and it is what the Obama administration has used. More than 50 researchers have published more conservative/smaller ranges of sensitivity of climate warming, more recently, more along the lines of $\sim 2^{\circ}\text{C}$.
- Models that the Obama administration relied upon are not doing well compared to the reality of the past few decades of temperatures. Forecast temperature is seven times more than the reality. To deny that is to deny science.
- Our planet is becoming more green as a result of an increase in CO_2 . CO_2 fertilization can create net benefit from the emissions through billions of dollars in increased agricultural output.

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VALUING CLIMATE DAMAGES: UPDATING ESTIMATION OF THE SOCIAL COST OF CARBON DIOXIDE

Public Report Release: January 11, 2017

Committee on Assessing Approaches to Updating the Social Cost of Carbon

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Division of Behavioral and Social Sciences and Education

Board on Environmental Change and Society

The National Academies of Sciences, Engineering and Medicine

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- Non-profit, 501 c(3) organization
- Does not receive direct federal appropriations
- About 200 reports per year, majority federal
- Volunteers serve on committees and boards
- 1300 staff - most are in DC

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- Integrates social and behavioral science research into environmental science and policy;
- Advances the behavioral, social, and decision sciences; and
- Benefits society through the application of these sciences to human-environment interactions.

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Study origin and description

The Interagency Working Group (IWG) on the social cost of carbon (SC-CO₂) requested this study to assist in future revisions of SC-CO₂ estimates.

Phase 1 - completed in January 2016 – focused narrowly on whether to update the equilibrium climate sensitivity and the presentation of uncertainty.

Phase 2 - committee examined potential approaches for a more comprehensive update to SC-CO₂ estimates to *ensure the estimates reflect the best available science.*

Phase 2 task specifics

Committee to focus on:

1. Assessing the available science and how it impacts choice of integrated assessment models and damage functions;
2. climate science modeling assumptions;
3. socioeconomic and emissions scenarios;
4. presentation of uncertainty; and
5. discounting.

Making recommendations on approaches to future updates of the SC-CO₂ estimates, as well as research recommendations

*Committee was not asked to estimate a value for the SC-CO₂

Background Information on the SC-CO₂

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What is the social cost of carbon?

Social cost of carbon (SC-CO₂): the cost to society of adding 1-metric ton of CO₂ to the atmosphere in a particular year (in US dollars)

Measures the monetized value of the additional CO₂ (including both negative and positive impacts).

This includes, but is not limited to:

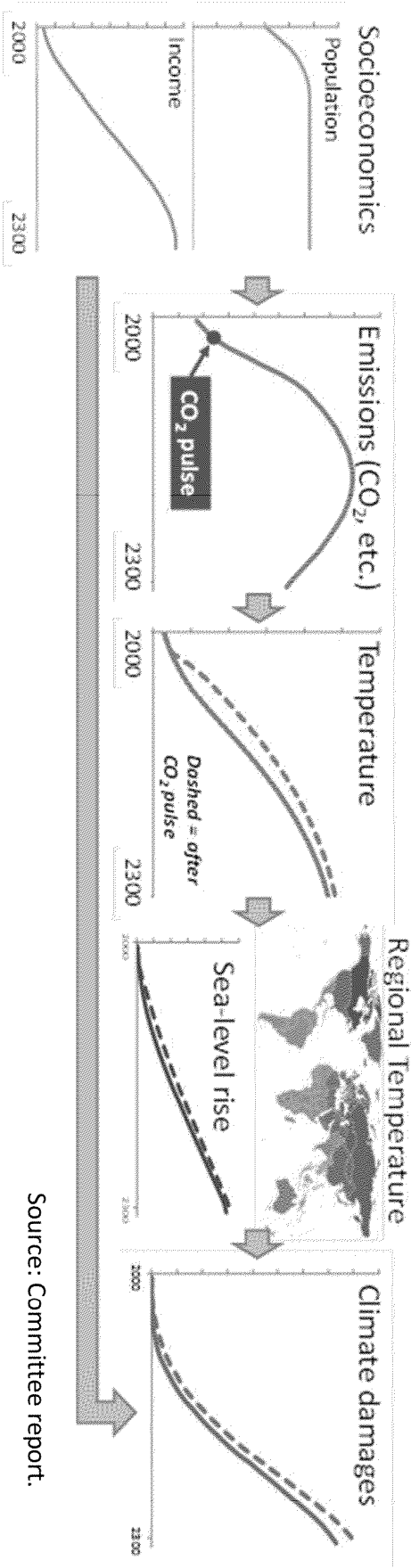
- Changes in net agricultural productivity
- Energy use
- Human health
- Property damage from increased flood risk
- Other impacts

What is the SC-CO₂ used for?

The SC-CO₂ is used to quantify the benefits of CO₂ emission reductions in regulatory impact analysis of federal regulations

- Executive Orders since 1981 have required quantifying the benefits and costs of federal regulations.
- A 2008 court ruling mandated the valuation of CO₂ emission reductions in federal regulations.
- Since then the SC-CO₂ has been used in dozens of regulatory impact analyses.

The 4 steps of SC-CO₂ estimation



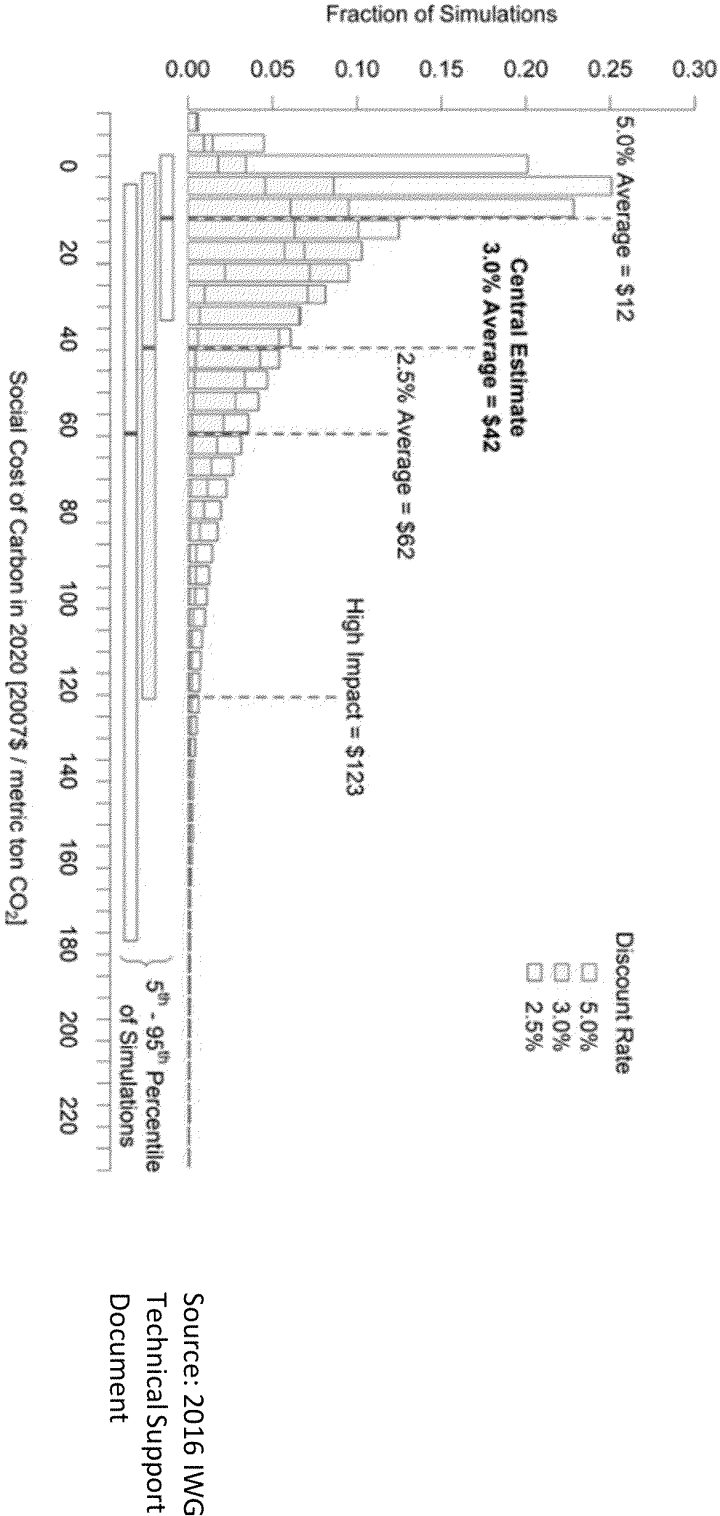
1. Projections of future population & GDP generate a CO₂ emissions path
2. CO₂ emissions path leads to predictions of mean global temperature change
3. Temperature change leads to damages, which are monetized and aggregated
4. Damages persist for many decades: discounting is used to sum them into a single present value

This 4-step procedure is done with both baseline emissions and with a small additional amount (a pulse) of CO₂ emissions in a particular year.

SC-CO₂ is the per-ton difference in present value of damages due to the pulse.

IWG estimation of the SC-CO₂

- The IWG used three integrated assessment models (SC-IAMs) from the peer-reviewed literature (DICE, FUND, and PAGE),
- five socioeconomic-emissions scenarios,
- a probability distribution for the equilibrium climate sensitivity, and
- three different constant discount rates (2.5%, 3.0%, 5.0%).



The Committee's Conclusions and Recommendations

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Organization of the final Phase 2 report

Ch. 1: Introduction

Ch. 2: Overview of the proposed SC-CO₂ modeling framework

Ch. 3-6: Specific recommendations for each of the 4 key modeling steps in the near term (2-3 years) and the longer term

- Socioeconomic module
- Climate module
- Damages module
- Discounting module

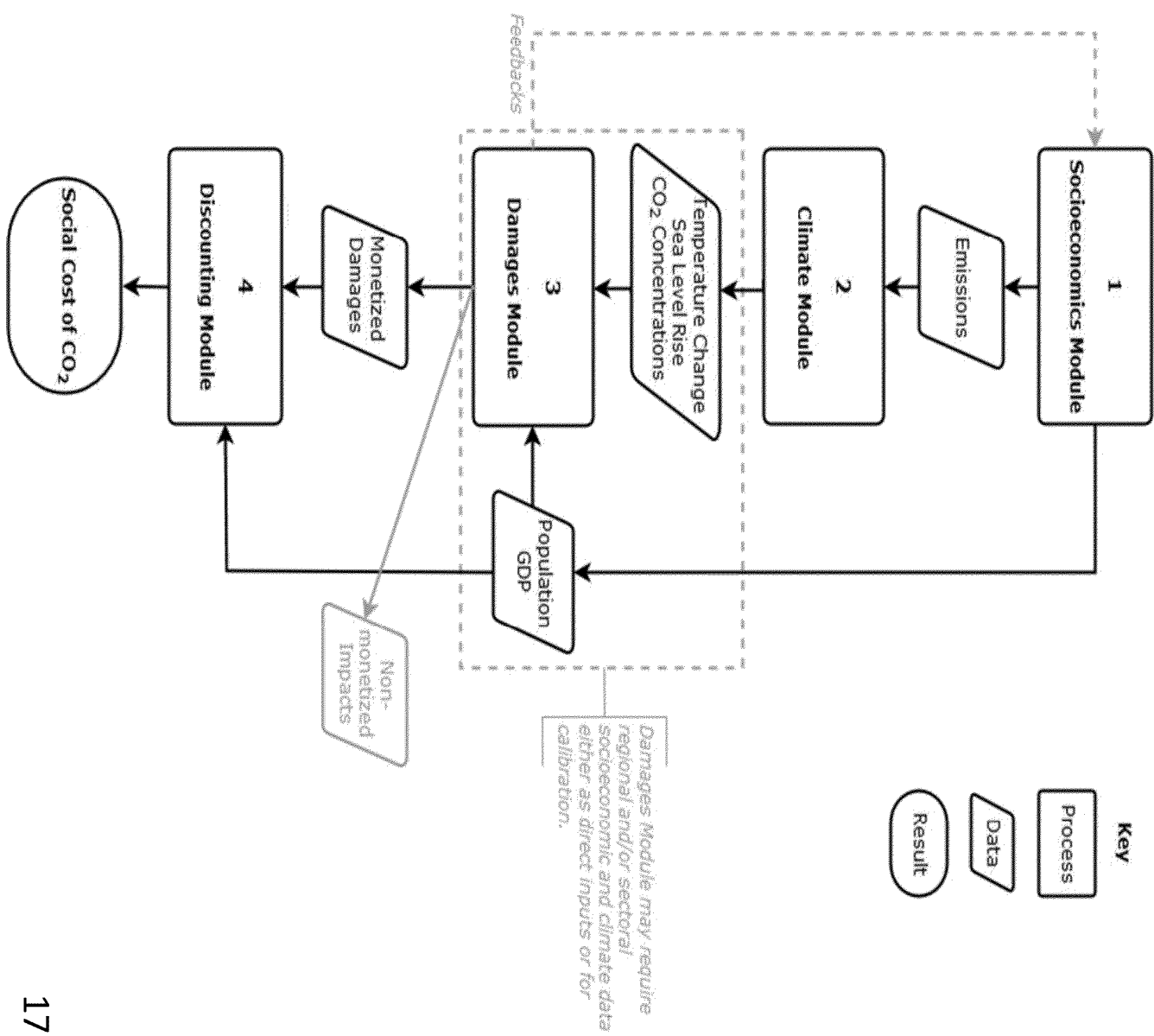
Ch. 7: Directions for future research

An integrated, modular framework (Conc. 2-1, 2-2, Rec. 2-1)

“Unbundle” the process of SC-CO₂ estimation into 4 modular steps that are integrated with one another.

- Each module would be developed based on expertise within the relevant disciplines and to reflect the state of scientific knowledge relevant to that part of the analysis .
- Provides a transparent articulation of the inputs, outputs, uncertainties, and linkages among the different steps.
- Can improve control over characterization of uncertainty within the steps and through an integrated framework for propagating uncertainty through the estimation process.

An integrated, modular approach for estimating the SC-CO₂ (Fig 2-1)



Over-arching criteria for SC-CO₂ estimation (Rec. 2-2)

- **Scientific basis:** Modules should be consistent with scientific knowledge in the current, peer-reviewed literature.
- **Uncertainty characterization:** Key uncertainties—including functional form, parameter assumptions, and data inputs—should be adequately represented. Uncertainties not quantified should be identified.
- **Transparency:** Documentation should allow people to understand and assess the modules, including which features are evidence-based or judgment-based. Model code should be available to researchers.

Domestic and global SC-CO₂

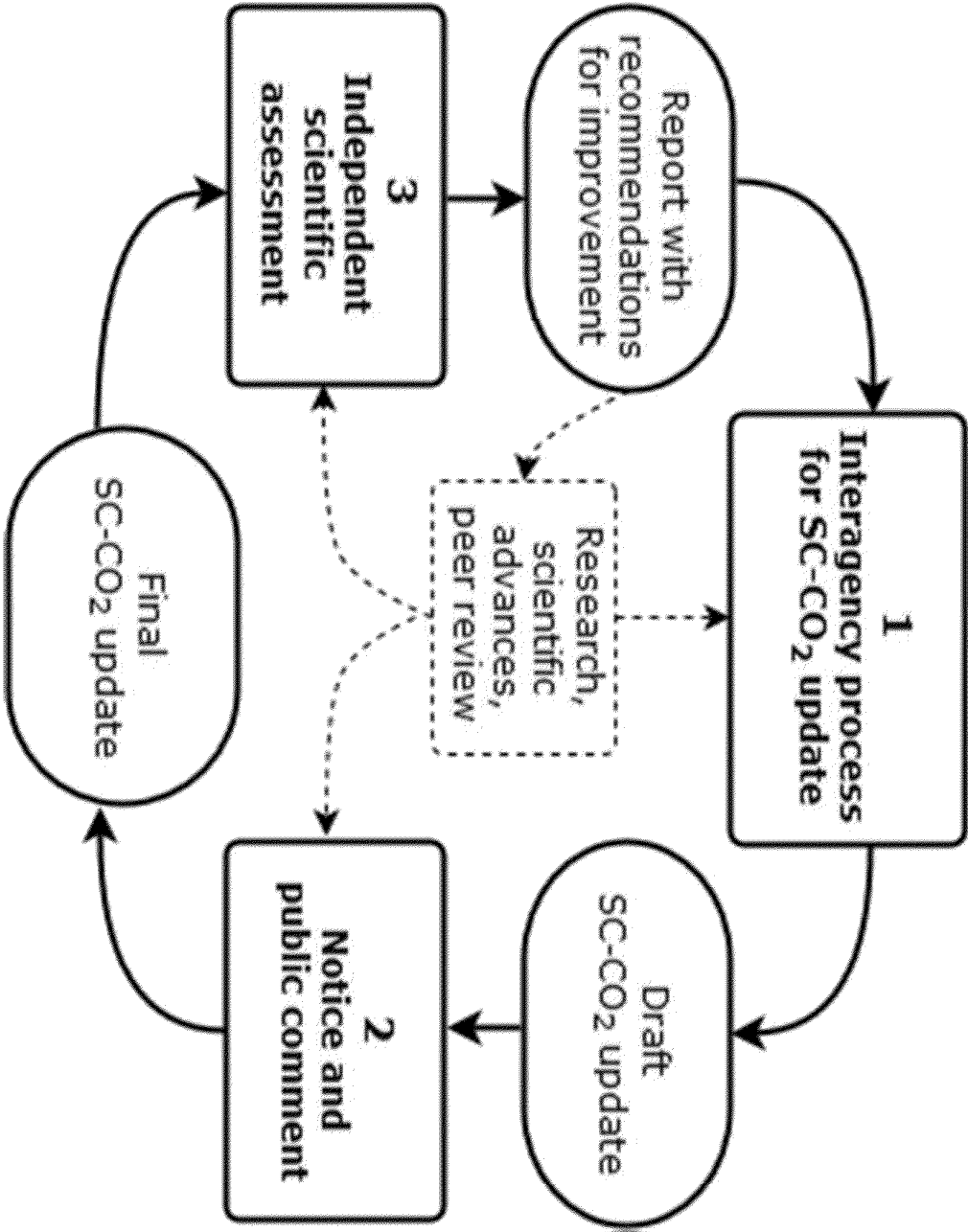
- **IWG has focused on estimating a global SC-CO₂, as has the peer-reviewed literature**
 - CO₂ impacts are global, regardless of where emissions occur.
 - Climate impacts in other countries may affect the United States (e.g., global migration, economic and/or political destabilization).
 - US emission reductions encourage reciprocal actions by other countries.
- **Difficulties in computing a US-only estimate (Conc. 2-4)**
 - Important to consider what constitutes domestic impact in the context of a global pollutant that has international implications that affect the US.
 - Need an SC-CO₂ framework that adequately captures these interactions.
 - Existing SC-IAM methodologies do not model all relevant interactions among regions.
 - In estimating a domestic SC-CO₂ need to consider potential implications of climate impacts on other countries and actions by other countries.

A regularized process to update SC-CO₂ estimates (Rec. 2-4)

- An update cycle of roughly 5 years balances the need to respond to **evolving research with the need for a thorough and predictable process.**
- The IWG should establish a **three-step process** for updating the SC-CO₂ estimates.

1. Estimates should be revised drawing on internal and external technical expertise and incorporating scientific peer review.
2. Draft revisions to the SC-CO₂ methods and estimates should be subject to public notice and comment.
3. The government’s approach to estimating the SC-CO₂ should be reviewed by an independent scientific assessment panel to identify improvements in future updates and research needs.

Regularized process for SC-CO₂ updates (Fig. 2-2)



Near-term and Longer-term Updates

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Near-term Updates

Recommendations that would be feasible to implement in the next 2 to 3 years:

- **Socioeconomic module** should use statistical methods and expert elicitation for projecting distributions of GDP, population growth and emissions into the future
- **Climate module** should employ a simple Earth system model that satisfies well-defined diagnostic tests
- **Damages module** should improve and update existing damage functions drawing on recent scientific literature
- **Discounting module** should incorporate the relationship between discount rates and economic growth to account for uncertainty over long time periods

Longer-term Updates

- Longer-term steps for the development and improvement of each module are outlined along with characteristics that each future module should have.
- Feedbacks between the modules and interactions within each module should also be incorporated in the longer term.

Research priorities for SC-CO₂ estimation

The report outlines priorities for research to improve the socioeconomic, climate, and damages modules, including:

- Studies of interactions and feedbacks within the human-climate system. (Conc. 2-3)
- Quantification of the importance of feedbacks from damages to socioeconomic projections. (Conc. 3-1)
- Development of detailed structural economic models suitable for projections over long time horizons. (Conc. 3-1)
- Incorporation of more comprehensive climate models in the SC-CO₂ framework. (Conc. 4-5)
- Expansion of research on climate damage estimation. (Conc. 5-1)

Summary

- A modular approach should be adopted to allow relevant disciplinary expertise to shape each part of the SC-CO₂ analysis.
 - Output from each module should be presented in probabilistic form to facilitate uncertainty analysis of results.
 - Explicit probability distributions should be derived for socioeconomic inputs (GDP, population, emissions).
 - The climate module should represent temperature change over time and include sea-level rise and ocean pH components.
 - Damage functions should be updated to reflect recent literature.
 - The discounting approach should link discount rates to the uncertain rate of economic growth and, in turn, damages.
 - Criteria regarding the scientific basis, characterization of uncertainty, and transparency should be applied.
 - A regularized 3-step process should be established for updating the SC-CO₂ roughly every 5 years, informed by ongoing research.
-

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From: Martinich, Jeremy
Sent: Tue 6/6/2017 2:49:54 PM
Subject: Revised Qs&As for GAO Mtg Tomorrow
CCD Responses to ALL STAFF-#2206329-v4-QUESTIONS FOR EPA FOLLOW-UP MEETING -
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Hi Paul and Suzie,

Attached for your review are the revised Qs&As for tomorrow's meeting. Happy to make any additional changes prior to the meeting.

Thanks,

Jeremy